RYAN SWANSON
Lawyers since 1897

Ryan, Swanson & Cleveland, PLLC
1201 Third Avenue, Suite 3400
Seattle, WA 98101-3034
206.464.4224 | Fax 206.583.0359
Toll-free 800.458.5973
www.ryanswansonlaw.com

Jo M. Flannery
Attorney Of Counsel

direct dial 206.654.2241
flannery@ryanlaw.com
Ref. No. 785988.01/015435.00010

April 15, 2013

Via U.S. Mail and Electronic Mail

Dennis McLerran, Regional Administrator
U.S. EPA - Region 10
1200 6th Ave., Suite 900
Seattle, WA 98101
mclerran.dennis@epa.gov

Re: Rainier Commons, LLC – Old Rainier Brewery Exterior Paint Abatement Work Plan Application and Request for Risk-based Disposal Approval

Dear Mr. McLerran:

We represent Rainier Commons LLC, owner of the Old Rainier Brewery site in Seattle. Enclosed please find Rainer Commons' Work Plan to abate historical layers of dried applied paint containing PCBs at a concentration ≥ 50 ppm. This Work Plan was previously submitted in draft form to EPA at the project manager level. We received comments back for edits, supplements and clarification from Dave Bartus at EPA. We have addressed each of the items in the comments on the draft and now submit this final Work Plan for approval.

It is EPA's position that the historical layers of paint, which contain PCBs at or above 50 ppm, is paint in "use" on the buildings and that under the Toxic Substances Control Act, 15 U.S.C. 2601 *et seq.* ("TSCA"), this "use" is unauthorized. EPA does not currently recognize an exception to this "use" and does not recognize a current rule that would exempt this "use" from the TSCA use prohibition.

By agreeing to implement this abatement work, Rainier Commons is not adopting EPA's positions or interpretation of the TSCA and is not waiving its right to formally disagree or take alternate positions in the future. However, for the sake of expediency and to take action that Rainier Commons deems, at the present time, to be in the best interests of all concerned, it is moving forward with this proposed abatement on a voluntary basis. Accordingly, Rainier Commons will authorize the work to commence upon receipt of EPA's approval of the Work Plan.

EPA considers the dried applied paint on the walls of the buildings to be PCB bulk product waste as that term is defined at 40 C.F.R. § 761.3. Because the paint was applied at a time that the application and use was legal and the application of the paint was not a spill or

other type of unlawful release, we do not agree that the substrate, following abatement via sand/soda or walnut shell blasting, should be treated as PCB remediation waste. EPA currently considers the substrate (the underlying brick and concrete), following abatement of the dried applied paint, to be PCB remediation waste, as that term is defined in 40 C.F.R. § 761.3. Again, Rainier Commons does not waive any right to object or to defend in the future against EPA's position.

Fortunately, pilot testing conducted in conjunction with EPA and pursuant to a previous risk-based approval application, on what has been referred to as the Sixth Floor Stairwell area (formerly an exterior wall that is now an enclosed staircase) as well as a similar area in the Tully's space, demonstrated that, where the paint was effectively removed from the brick and concrete surfaces, migration into the substrate was not an issue. Because migration of PCBs to the substrate from the dried applied paint has been ruled out, through extensive substrate core sampling and analysis as a part of these pilot tests, the disagreement regarding the characterization of the substrate should be academic at this point and should not pose further issues going forward.

Notwithstanding the various disagreements preserved and referenced above, we are in mutual agreement that EPA is authorized under C.F.R. 761.61(c) to approve practical procedures for sampling, clean up, disposal or storage of PCB remediation waste where the method will not pose an unreasonable risk of injury to health or the environment and that Rainier Commons has the right under 40 C.F.R. 761.61(a) to self-implementing on-site cleanup and disposal of PCB remediation waste. We further agree that EPA is authorized under 40 C.F.R. 761.62(c) to approve sampling or disposal of PCB bulk product waste in a manner that does not pose an unreasonable risk of injury to health or the environment. The enclosed Work Plan provides for the abatement of PCBs and includes all appropriate provisions for protection of human health and the environment during the course of the work.

While these particular regulations, referenced above, are not a perfect match for the project at hand, namely removal of PCB bulk product waste, from a vertical surface of an intact building, this is a novel enforcement action and these are the regulations that EPA has directed us to and we agree they are the best existing fit for the project that we can identify, at this time. In addition, these were the regulations utilized to carry out the successful pilot testing under a previous application.

Thus, Rainier Commons is requesting that EPA exercise its authority under 40 C.F.R. 761.61(c) and 40 C.F.R. 761.62(c) to approve the remediation Work Plan proposed herein, under the risk based approach provided in these regulations and or to approve the Work Plan on any other or additional basis upon which EPA has authority to grant the approval. In addition, Rainier Commons has the right to self-implement its on-site cleanup and disposal in compliance with 40 C.F.R. 761.61(a)

The enclosed Work Plan contains all of the components and details that EPA requested to be included. During the work, the abatement area will be protected and all work will be carried

out according to the Work Plan. Tenting, full containment and negative air pressure will be established for the work area. Secondary site protection, spill prevention and response plans will be provided by the contractor for approval by EPA at the project manager level, before work commences. The paint will be abated using soda blasting or blasting with sand or walnut shells. Following paint removal, the area will be cleaned using a hepa-filter vacuum and other appropriate means to eliminate dust and residue. Each area abated will be subjected to the sampling criteria and approval process outlined in the Work Plan. The containment material itself will be treated with a lock-down product to control dust and other measures for decontamination specified in the Work Plan will be taken, before the containment is disassembled and appropriately disposed of. The brick will be re-pointed to repair damage due to loss of mortar during the course of blasting.

Pilot testing demonstrates that, where all of the paint is physically removed, even the stringent unrestricted high occupancy level of $\leq$ 1 ppm for PCB remediation waste is met. Therefore, unlike the initial application for the pilot testing, no risk-based exception or approval for the substrate is necessary at this time. In addition, the brick and concrete underlying the historical layers of paint are in low occupancy areas, with a clean-up level for PCB remediation waste of $\leq$ 25 ppm. These areas are on the exterior of the buildings, and no location is used by any person for any extended period of time. People may stand for short periods of time adjacent to the walls or walk past them, but that is the extent of use and exposure. In addition, much of the affected area is more than one story above the ground surface. The Work Plan is designed to remove all of the dried applied paint at issue. Migration of PCBs to the substrate has been ruled out by prior coring, sampling and analysis. Thus, we are not including re-coating as an element of the Work Plan. Rainier Commons may elect to seal or repaint abated areas following the Work, but may also elect to leave the natural brick look in some or all areas abated.

Each of the buildings at the project have been evaluated, wall by wall, and given a priority ranking. Exhibit C to the Work Plan shows the priority ranking of each wall of each building. Exhibit C and the rankings therein have been vetted with EPA. The rankings are based upon sampling results, concentrations of PCBs, current condition of the paint and weather exposure of the buildings. The sampling data collected over time, correlated to each building and each wall is also provided in a compilation with graphics or photographs at Exhibit A to the Work Plan. These exhibits along with the other exhibits to the Work Plan provide the site characterization called for in the above-referenced regulations.

This letter is Rainier Commons' notification to EPA of the planned work, as required by the above-referenced regulations. The Work Plan and the attached exhibits contain all of the required information regarding the nature of the PCB contamination (dried applied paint), sampling, locations and extent of the areas to be abated, and the cleanup plan. A written certification signed by the owner and the party conducting the cleanup confirming that all required sampling and cleanup documentation will be preserved at the site and kept available for EPA's review will follow under separate cover. We are authorized to represent here, on behalf of the owner, that those documents will be kept in due course, and will be available to EPA for inspection, upon request, throughout the execution of this Work Plan.

The contractor identified to perform the initial phase of this scope of work is Construction Group International or CGI. Rainier Commons has retained Lindstrom Company LLC to perform the construction specific project management work, in addition to staffing the project with a Rainier Commons' project manager. NVL Labs has been retained to provide environmental services, sampling, compliance and industrial hygiene services. Emerald Services is the environmental waste transport and disposal contractor currently designated to handle the waste. They have worked with Rainier Commons on past projects and are now familiar with all the various disposal options for the wet and dry waste streams that will be generated by the work and the controlling regulations.

Rainier Commons is planning to commence the work in mid-May to take advantage of the window of typically better weather presented in late spring and continuing through the summer. The work will proceed in phases according to their respective priority ranking. The initial phase of work, planned to commence as soon as EPA approves this Work Plan, includes Building 13, and the west elevations of Buildings 10 and 11, all high priority areas. Again, Rainier Commons requests approval to commence this initial phase of work as early as mid-May 2013.

We look forward to EPA's approval of this application and the attached Work Plan.

Very truly yours,

RYAN, SWANSON & CLEVELAND, PLLC

Jo M. Flannery
Attorney Of Counsel

Enclosure

cc: Rainier Commons, LLC
Alex Fidis
Michelle Mullen
Tristan Gardner
Scott Downing

785988.01

NVL LABS
HAZARDOUS MATERIALS SERVICES

MANAGEMENT | TRAINING | LAB SERVICES
www.NVLLABS.com

Rainier Commons Work Plan

Exterior Paint Removal
&
Limited Scope for Follow-up on Interior Surfaces

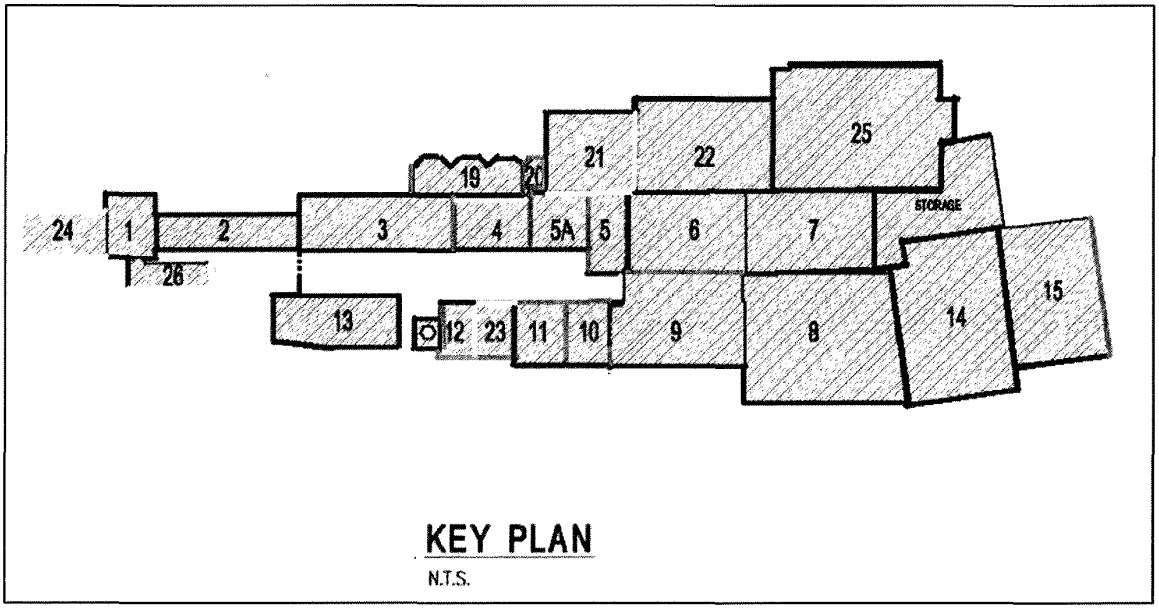
Dated March 25, 2013

Table of Contents

1 Introduction and Background

The Rainier Commons facility, known as the "Old Rainier Brewery", is a 4.6 acre site with 24 buildings of varying ages[1], located at 3100 Airport Way South, Seattle, Washington 98134 (the "Project"). Most of the buildings are multi-floored, up to eight levels, with painted brick, concrete and sandstone exteriors.

Dried applied paint containing polychlorinated biphenyls (PCBs) above the regulated limit (≥ 50 ppm) has been identified in some, but not all locations, on the exterior surfaces of buildings at the Project. Although compliant with the laws existing at the time it was applied, the paint is modernly considered an unauthorized use of PCBs at the Project. Rainier Commons has been working with EPA to identify an effective abatement method to retire the use of the dried applied paint where it exceeds the regulated limit.



2 Purpose and Scope

Purpose

The purpose of this Work Plan is to outline the means and methods by which the dried applied paint at Rainier Commons will be removed from the surfaces of the buildings in

[1] See Key Plan with building numbers referenced on footprint drawing.

need of remediation and thereby retire the use of the non-conforming paint; outline the performance and compliance standards for the work; outline the anticipated schedule for commencement of the work; and present plans for related items such as waste disposal, health and safety and record keeping.

Scope

The scope of work includes the removal and disposal of paint on identified surfaces.

Surfaces will be cleaned such that there is no visible paint remaining[2].

NVL will conduct project oversight, on behalf of Rainier Commons, and document actions during the course of the work, including when actions are completed. NVL's work will be carried out according to this Work Plan and written approval provided to Rainier Commons by EPA.

NVL will work with Rainier Commons to help assure proper temporary storage and disposal of waste generated from the work.

The work will be completed in phases depending on priority designation as documented in Exhibit C to this Work Plan, owner/tenant requirements, Contractor's needs and sequencing schedule as more fully described in Section 3 "Areas to be Abated" below, and overall cost and funding for the work.

Schedule notification of each phase will be provided to EPA, twenty (20) days prior to starting of that phase of work.

All work shall be performed in accordance with applicable local, state and federal regulations, standard industry practices and specific requirements described in this Work Plan and the contract documents. This Work Plan shall form the basis for an application to EPA for a Risk Based Disposal Approval ("RBDA") under 40 CFR 761.62(c) and or other applicable section of the Code and will be submitted to EPA for approval. If and when a conflict exists in any of these requirements, the more stringent requirement shall apply, and in particular the requirements of 40 CFR 761 shall control. Furthermore, the Contractor shall familiarize all employees with this Work Plan and all site conditions. Any quantities and locations provided by Rainier Commons or NVL are to be considered an estimate. As a result, the Contractor is responsible for verifying quantities and the detailed site conditions impacting the work for each segment or phase of the work.

3	**Detailed Description of the Proposed Work**	

[2] The goal will be complete removal of the paint, with the understanding that the infrequent, small fleck of paint remaining post-abatement is functionally unavoidable as a practical matter. Complete removal and completely clean to visual inspection will be required of the Contractor.

Overall

Paint removal will be done using allowed work methods under controlled conditions.

Any abrasive blasting will be done such that the underlying substrate is protected and left intact, with the understanding that some of the brick mortar will be lost during the abatement, and consistent with the requirement that the performance standard leaving no visible paint remaining is met.

Areas to be Abated

The work includes full removal of exterior paint, subject to reduction in scope as future sampling rules out abatement of certain exterior walls or buildings.

See "Rainier Commons Exterior Walls Abatement Project September 2012" document attached as Exhibit A identifying buildings and elevations at the Project. These pages provide photographs or drawings and rough estimate quantities of square footage for each area to be abated. Exhibit A also includes historical sampling data gathered from various sources over time.

See Key Plan Figure, showing the building footprints, attached as Exhibit B, which is color coded in descending order of priority from red, showing first priority areas, to orange, blue, yellow and then green. See also the area break outs on the Rainier Commons Paint Abatement Priority Schedule attached as Exhibit C. Priority in these documents is based upon PCB concentrations and condition of the paint. The phasing of the work by the Contractor may not follow these groupings precisely as access and site condition considerations may dictate slightly different groupings. The Key Plan serves as a guide to priority treatment. Rainier Commons also reserves the right to reconfigure the phases of work according to weathering or condition of the paint, consideration of tenants and occupants, overall job costs and funding, among other items, after notice of any necessary changes to EPA.

Rainier Commons will solicit bids for the entire scope of work and then employ phasing as necessary to carry out the work. Prospective Contractors have alerted Rainier Commons that due to the lack of uniformity at the Project and the extent of the work, considerations of location of temporary power, scaffolding, mix or type of substrate, mix of windows and other penetrations, protecting surfaces that do not need blasting, securing interiors and access to interiors, and other site considerations, phasing will be necessary to accommodate Contractor needs.

Reservation of Right to Remove Areas from Scope

Laboratory results on paint samples collected from the walls of certain buildings at the Project are non-detect for PCBs or below the regulated limit of ≥ 50 ppm. Some of these buildings may be of newer construction or were not painted when the historical layers of PCB containing paint were originally applied. For purposes of this Work Plan it

is assumed that all exterior areas with dried applied paint contain PCBs at the Project. However, Rainier Commons has and will continue to conduct "Data Gap Sampling" in areas with dried applied paint containing low or no PCBs. Should these areas prove, to EPA's satisfaction, to use paint that is below the regulated limit, ≥ 50 ppm, then Rainier Commons reserves the right to remove those areas from the Work Plan.

Because Rainier Commons does not wish to delay the Work Plan or remediation on the majority of the buildings, Rainier Commons proposes this plan for all of the buildings, with the ability to remove certain buildings or elevations from the Work Plan as additional testing is available. This approach will result in a minor modification of this Work Plan as data is available, instead of delaying the entire project. Parameters for acceptance of adequate "Data Gap Sampling" to rule out the need for abatement on any exterior area will be established outside of the approval to this Work Plan or can be supplemented to this Work Plan, after initial approval by EPA, again as a means to avoid delay in commencing work on the priority areas.

It is understood that any Data Gap Sampling Plan presented for EPA's future approval will include a Work Plan outlining, among other things, the decision criteria to be used for establishing the number of samples to be obtained for each section of a building proposed to be sampled and evaluated.

Of special note, surface areas that have no visible paint in use are considered non-PCB containing.

Areas for Limited Interior Follow-Up

Sixth Floor Touch Up: Small but visible areas of paint remained after blasting in the pilot test area, referred to as the sixth floor work carried out between October 19, 2011 and November 2, 2011, as reported to EPA in the December 9, 2011 report by CDM. All substrate samples returned results below 50 ppm, but 6 of 8 concrete samples where residual paint remained visible were above 1 ppm. At the end of the exterior abatement work, or at another time that is more convenient, at Rainier Commons' election, the Contractor will be directed to touch up, via hand grinding or additional blasting, the concrete area at the sixth floor to remove additional visible paint. While all of the brick areas sampled returned substrate results below 1 ppm, a few isolated areas with small amounts of visible paint on brick surfaces remained and will be touched up when the concrete is addressed.

Collect Additional Paint Samples - North Section of East Wall at Building 1: PCB containing paint was removed from two adjacent interior walls in Building 1 (previously referred to in error as building 24, the Tully's space). One sample collected from the east wall returned a concentration of PCBs right at the regulated limit of 50 ppm. Abatement of that east wall was carried out to the interior dividing wall. EPA has requested that samples be collected on the north side of the divider wall. Therefore, Rainier Commons proposes to collect three additional paint samples on the north section of the east wall in Building 1 (Tully's space) consistent with the Building 1 Sampling Figure attached as Exhibit D. This sampling shall be carried out within two weeks of approval of this Work Plan.

Process

The process of the work activities include:

Step #	Description
1	Preconstruction meeting(s), verification and review of all contract requirements to include, but not be limited to, verification of all required certifications for personnel working the job and review of Health and Safety Plan
2	Mobilization and work area set up (see Work Area Set-Up – Controlled Conditions below for more detail)
3	Inspection and acceptance by NVL of work area set up prior to any abatement work
4	Contractor conducts abatement work following this Work Plan and other project contract documents
5	NVL conducts project oversight and monitoring during abatement work to Provide assurance that: • The Work Plan is followed • Adjacent areas are protected (see NVL Project Oversight below for more detail)
6	Notification by Contractor to NVL that paint removal is complete and ready for inspection
7	General inspection by NVL of paint removal and determination if paint removal is complete: • If not complete, further action by Contractor and repeat of step 4 • If complete, then proceed to step 8
8	a: Notification to EPA by Rainier Commons to allow for inspection. b: Verification Sampling by NVL (see Verification Sampling and Analysis Requirements and Procedures in Section 5 below for more detail) c: After inspection, • If accepted, work activities will proceed to step 9 • If not accepted, then work activities will be to conduct required action, most likely returning to step 4 d: EPA reserves the right to inspect the work, at its discretion, but does not need to conduct an in-person inspection of each section of work for the owner to accept the work with the Contractor. If no additional inspection or work is required by EPA, the work will be considered "accepted" and project activities will proceed to step 9, subject to any additional action required following NVL sampling.
9	Tear down following accepted practices, and demobilization

Notification Process and Response Period

The process for the Contractor to notify NVL and Rainier Commons' Project Manager that paint removal is complete and ready for inspection will be detailed at the pre-

construction meeting and in the contract documents. In general, it is expected that the Contractor will provide a minimum of 24 hours of notice prior to needing services. Exceptions to this requirement will require specific arrangements.

Rainier Commons is responsible for any and all notifications to the EPA, particularly to allow for inspections. In general, EPA expects that the Work Plan and its performance standard, documentation and reporting requirements will be followed and EPA will evaluate compliance with the approved Work Plan primarily through after-the-fact documentation review. EPA reserves the right to conduct on-site inspections at its discretion, but will not need to physically inspect each section of the work before the work can be approved with the Contractor by the Owner and NVL.

EPA and Rainier Commons will employ a Project Manager framework to track and manage progress of the work according to the approved Work Plan. EPA's written approval of the Work Plan will include a mechanism whereby the designated Project Managers for Rainier Commons and EPA will be authorized to propose and agree to minor field changes to the Work Plan and written Work Plan approval. This mechanism will also include a documentation and recordkeeping requirement, for example, Project Manager meeting minutes.

EPA will confirm its designated Project Manager and the Project Manager's contact information in its written approval of this Work Plan. Rainier Commons will confirm its Project Manager designation and contact information within one week of receiving EPA written approval of this Work Plan.

Additional Abatement and Costs if Work Fails NVL or EPA Inspections

If the Contractor needs to conduct additional work due to findings of NVL or EPA inspections, the work will be done at no additional cost to the Owner. In addition, the Contractor will be responsible for any additional inspection or testing costs.

Accepted Abatement Methods

- Abrasive Blasting, with blasting media composed of any or all of the following:
  - Sand
  - Walnut shells
  - Baking soda

- Hand methods, including small tool scraping and/or concrete grinder as supplement to blasting or for final touch up

Requesting Alternative Techniques to Accepted Abatement Methods

Alternatives to the accepted abatement methods may be requested by the Contractor. For example, removal of a discrete metal panel, as opposed to abatement of paint from the exterior surface, or proposal for alternate means of paint removal for limited area(s), for example, chemical stripper for selected window frames, may be expedient or

necessary. If an alternate to the accepted abatement method is desired for a discrete area, it will be proposed by the Contractor to Rainier Commons, then discussed and agreed to at the Project Manager level between Rainier Commons and EPA project managers. The Contractor's project manager may also be involved in these discussions. If agreed to and documented through the Project Manager process (referenced above and to be outlined in the pending written approval of this Work Plan by EPA) the change will be considered a modification to the approved Work Plan. Alternatively, if the Project Managers cannot agree on a proposed change, Rainier Commons may formally request a written modification to the EPA written approval.

The Contractor must first propose the alternative AND receive approval by the Rainier Commons Project Manager prior to implementing any alternative abatement method.

Mobilization

The Rainier Commons Project Manager, per the project contract, will identify staging and set up locations at the site, for each work segment or phase.

Rainier Commons, as described in section 6 of this Work Plan, will identify the location for temporary storage of waste material.

Communication

In addition to what is described in this Work Plan, communication between the Contractor, Consultant and Owner will follow what is described in the project contract.

Communication with building occupants and with the regulatory agencies, pertinent to Rainier Commons matters, is the responsibility of Rainier Commons, not the Contractor. If the Contractor is contacted by occupants, outside entities, or regulatory agencies regarding Rainier Commons matters, the expectation is that a courteous response will be provided and that they will be referred to contact Rainier Commons for response to their inquiry.

The Contractor is responsible for any and all communication to comply with business and regulatory matters related to their operation.

Disposition of Movable Items

Rainier Commons will coordinate with Contractor removing any movable items that are necessary to facilitate the work.

Access

Building access and any and all use of the building's facilities is coordinated with Rainier Commons as identified in the project contract.

Contractor is to provide safe access for inspections conducted by Rainier Commons, NVL and regulators.

Work Area Set-up – Controlled Conditions

The Contractor shall provide a written plan for the work area set up. There shall be an overall Work Area Set-Up Plan that applies to all of the work, and any deviations, supplements or amendments shall be provided as needed for individual phases or sections of the work, with the phase or section of the work clearly identified on the Individual Phased Work Area Set-Up Plan. Each plan must be submitted by the Contractor to the Owner and NVL for approval in advance of the work commencing. In addition, Rainier Commons shall provide a copy of each plan to the EPA designated Project Manager for any comment and approval. Approval shall not be unreasonable withheld and shall be timely provided by EPA.

Requirements for the plan include:

- A negative pressure containment for any and all areas where paint will be removed

#	**The requirements of the containment include, as a minimum:**
1	Complete (full) containment – no dust, water or other debris may escape containment; areas adjacent to containment must be protected from a breach and no liquid or solid may escape to the sanitary sewer or storm water systems
2	Plastic requirements are: • Walls – 4 mil. Minimum • Floors – 2 layers of 6 mil. Minimum • Fire retardant
3	Critical Barriers over any windows or openings to the building -minimum, 2 layers of 6 mil. plastic sheeting -of 6-mil polyethylene sheeting shall be placed over all doors, windows, and HVAC openings during removal/remediation work.
4	Three-stage entry, including decontamination area with shower
5	Showers require use of a watertight pan to contain water. Water is to be characterized by NVL for proper disposal
6	Separate waste load out area
7	A minimum of -0.02 inches of water as a differential pressure measurement from inside/outside in relation to all adjacent spaces for negative pressure enclosures
8	View Ports will be installed at prescribed locations per NVL direction
9	Warning Signs – as described in this plan
10	Standby Generator(s) with automatic transfer switch(es) having the power capacity to minimally operate & maintain negative air machines (s) if there is a loss of standard power
11	Spill kits and emergency supplies will be required per the contract documents

General Set-up Requirements Include:

1	Any modifications for hook-ups shall be the responsibility of the Contractor for building supplied water and electricity.
2	All polyethylene sheeting used on this project shall be fire-retardant.
3	If required, the Contractor is responsible for assuring that all mechanical systems have been shut down and locked out, or adequately sealed with two layers of 6-mil polyethylene, to prevent contamination from entering systems.
4	The Contractor shall provide a manometer and manometer log for each containment.
5	GFCI are required on all electrical circuits in use.

Pre-abatement check by NVL: No removal work may commence until the Contractor has notified NVL, NVL has inspected the containment set-up, any deficiencies have been corrected by the Contractor and NVL has given permission to commence removal activities.

NVL Project Oversight

A Certified Industrial Hygienist (CIH) will review all inspections and sampling results and will approve all final determinations.

NVL will conduct daily sampling and project oversight inspections during the course of the project.

NVL is to be provided access to any and all areas of the Project necessary for oversight.

Daily Project Oversight requirements:

- Visual inspections and collection of air samples will be performed on a daily basis. Visual inspections will include confirmation that negative pressure enclosure is operational, and that no breach has occurred.
- Daily observations will also include exterior inspections of the containment for any suspect visible debris, water or dust.
- Daily air testing will include collection of air samples for potential airborne PCBs and will be collected at locations adjacent to the areas of abatement. A minimum of two samples will be collected in the outdoor

environment and two will be collected inside the building that is being abated.

- Measurements of air pressures for the negative pressure enclosure.

If at any time these oversight activities indicate any improper operation of the containment and/or breach of the containment; any suspect debris, dust or water is observed outside of the containment; if pressure testing shows inadequate pressure; or if air testing shows PCB levels that equal or exceed the NIOSH REL of 0.001 mg/M^3 the following will occur:

1. NVL will immediately notify Rainier Commons on-site Project Manager and notice will be given to the Contractor to stop work immediately.
2. Implement additional engineering controls and work practices necessary to correct the condition.
3. Any work stopped will not restart until determined safe to do so by NVL and Rainier Commons on-site Project Manager.

Clearance Criteria

The remediation work area is cleared when the work area meets the following criteria and all inspections and sampling have been accomplished:

Visual Inspection: For surfaces that have had paint removed – areas will be dry, free of dust and debris and no paint will be visible on surfaces.

For materials that comprise the enclosure, for example, but not limited to, plastic and scaffolding, the surfaces of these materials, at the time of the clearance inspections, and before any dismantling, shall also be dry and free of dust and debris from the abatement work. Special care and attention shall be given to removal of all dust and debris from scaffolding before inspection and before dismantling. The surfaces of enclosure materials that will be disposed of, for example, the plastic containment material, will further be coated with a lock-down product, prior to dismantling and handling for disposal. The Contractor shall provide the specific details regarding products to be used and the means and methods to carry out this decontamination and containment work, including the specifics on how the containment will be dismantled, as a part of the contract documents, which will be subject to the EPA's review and approval at the Project Manager level.

Clearance Criteria Failure

Should NVL determine that the clearance criteria has not been met, the Contractor at its own expense shall ensure that the negative pressure enclosure remains in place and shall re-clean as stated in the procedures. Following the

re-cleaning and prior to proceeding, the work area must meet the clearance criteria and must be retested at the Contractor's expense.

Warning Signs

The following describes the required warning signs at the Project:

Location	Title of Sign	Wording on Sign
At entrances to construction site:	Construction Site	**DO NOT ENTER** **RAINIER COMMONS CONSTRUCTION SITE** **AUTHORIZED PERSONNEL ONLY**
At entrances into the containment:	Containment PCB Warning	**HAZARDOUS MATERIAL** **CONTAINMENT ENTRANCE** **Entry past this point is into containment** **AUTHORIZED PERSONNEL ONLY** **PCB containing material present**
At areas where waste is stored:	PCB Storage Area Warning Black letters with bold stripping in a box surrounding the text consistent with 40 CFR 761.45 Marking Formats on a yellow background measuring at least six inches on each side or larger as may be practicable for each storage site	**CAUTION** **This area contains stored PCBs** **(Polychlorinated Biphenyls)** **A toxic environmental contaminant requiring special handling and disposal in accordance with U.S. Environmental Protection Agency Regulations 40 C.F.R. 761** **For disposal information contact the nearest U.S. EPA Office** **DO NOT TOUCH** **Authorized Personnel Only** **In case of accident or spill call toll free the U.S. Coast Guard National Response Center: 800-424-8802** **Also Contact: Rainier**

		Commons Project Manager Telephone No. _____
On waste containers	PCB Waste Warning Black letters with bold stripping in a box surrounding the text consistent with 40 CFR 761.45 Marking Formats on a yellow background in a rectangle measuring at least 1 inch by 2 inches or larger as may be practicable	**CAUTION contains PCBs** **(Polychlorinated Biphenyls)** **FOR PROPER DISPOSAL INFORMATION CONTACT U.S. ENVIRONMENTAL PROTECTION AGENCY** **DO NOT TOUCH** **AUTHORIZED PERSONNEL ONLY**

In addition, Rainier Commons will be responsible for any and all posting of information about the work, including any warning and/or educational signs, for tenants or the general public outside the area assigned to the Contractor.

Security/Safety

The Contractor is responsible for maintaining a secure and safe work area and for its worker's safety, and for all inspectors and other vendors, subcontractors or Owner's representatives in the work area, at all times, including but not limited to initial mobilization through final completion and full demobilization.

Waste

Proper collection, handling and temporary storage in pre-designated areas, following established procedures, is the responsibility of the Contractor. Rainier Commons is responsible for all waste disposal.

Categories of waste generated from this project will include:

1	**PCB containing waste** • Dry • Wet / Liquid
2	**Materials in contact with PCB materials** • Examples include PPE, plastic, and Tyvek materials.
3	**Sanitary Waste** general construction debris
4	**Recycling** • non-contaminated materials that can be recycled

For PCB waste, the intent is for it to be and to remain dry, where possible. If PCB waste is wet, it will be collected and stored separately.

PCB bulk product waste generated from this project must be managed according to the requirements of 40 CFR 761.65(b). Non-liquid wastes such as PPE, plastic, and Tyvek materials may be disposed of according to the requirements of 40 CFR 761.61(a)(5)(v).

Worker Protection

Worker protection requirements are described in Section 9: Health and Safety Plan (Worker Health & Safety).

Qualifications of Individuals

In advance of any work, it is the understood responsibility of Rainier Commons to provide written assurance to the EPA that all on-site personnel who will be conducting activities have appropriate qualifications and training. As a result, the Contractor must provide Rainier Commons documentation that all personnel involved with performing the work or supervising the work have valid and up-to-date training ("HAZWOPPER" – Hazardous Waste Operations) as required per WAC 296-843-200. In addition, the Contractor must provide written confirmation that personnel have received applicable Community and Worker Right-to-Know and Chemical Hazard Communication information. Additional requirements may be required as set forth in the controlling Health and Safety Plan.

This will be a contract requirement at the pre-construction meeting and supplemented as necessary at initial mobilization and as each new phase of work commences.

Occupancy

The buildings at Rainier Commons are to be considered occupied during all removal activities. Occupancy of adjacent areas is to be discussed and coordinated during performance of the work with Rainier Commons.

Completion of Work

Upon completing work, the Contractor is to notify NVL and the Rainier Commons Project Manager that paint removal is complete and ready for inspection.

Performance verification conducted by NVL is described in Sections 4 and 5.

Tear Down

Contractor will be given notice when tear down can occur. No tear down can occur until authorized.

De-mobilization

Contractor will be given notice when de-mobilization can occur. No de-mobilization can occur until authorized.

4 Performance / Cleanup / Verification Standards

Performance

Rainier Commons will provide the Contractor a written notice of the approval from EPA to conduct the work to be performed per this Work Plan and the contract documents, namely full and complete removal of dried applied paint in all designated work areas, passing visual inspection for complete removal of paint, while observing all health and safety requirements.

The Contractor is responsible to convey all necessary information regarding the work to any and all employees, sub-Contractors and vendors.

By being awarded the contract and agreeing to follow this Work Plan, the Contractor accepts this responsibility.

Clean up / Verification Standards

Verification Accomplished Via Visual Inspection:

Prior post-abatement sampling results on brick, concrete and cementitious plaster substrates at the Project have demonstrated that physical removal of the paint meets clean-up requirements for PCB remediation waste. Migration of PCBs from this dried applied paint has been ruled out as a concern through prior substrate testing.

Therefore, visual inspection for complete removal of the dried applied paint, to the extent reasonably practicable, satisfies clean-up and verification requirements for this work.

> Visual Inspection: Areas will be dry, free of dust and debris with no paint visible on surfaces[3]. Sampling procedures after paint removal and general visual inspection will follow verification sampling and analysis requirements and procedures described in Section 5 below.

5 Verification Sampling and Analysis Requirements and Procedures

[3] It is understood that the infrequent, small fleck of paint may remain post-abatement as it is functionally unavoidable.

Verification Sampling Following Paint Removal, General Visual Inspection, and Provisional Acceptance of Work

The establishment of rectilinear grids with coordinated, labeled horizontal and vertical axis in 2 foot or 2.5 foot square grids as carried out on the interior spaces previously abated at the Project is not practicable for the exterior surfaces. The exterior areas are large, multi-storied and multi-surfaced (see Exhibit A). Considerations of cost effective access and safe access present a barrier to the grid approach, which was employed on smaller interior areas. Scaffolding may be installed in stages pursuant to the Contractor's needs. The size of each contained segment of work will not be the same. For these reasons, a simple expansion of the grid size is not appropriate. Rainier Commons, therefore, proposes the detailed verification sampling be carried out on two percent (2%) of the total wall surface abated, as outlined below, in addition to the 100 percent (100%) visual review and compliance requirements NVL will perform as the Contractor releases each level for inspection.

The abatement work will not be provisionally accepted until it has passed NVL's general visual inspection, separate and apart from the detailed compliance sampling outlined below.

Most of the exterior surface to be abated will need to be accessed via scaffolding. Verification sampling will, therefore, need to take place while both scaffolding and containment remains in place. It is anticipated, subject to reasonable Contractor adjustments, that scaffolding will be installed on a floor to floor basis, rising in approximately 10 foot intervals.

NVL Visual Inspection of 100 Percent of Area Abated

When the Contractor notifies NVL that a level, or segment of work, is complete and ready for inspection, qualified NVL personnel will walk each level, either ground or scaffold level, and visually scan the entire work area for any residual paint, with Contractor performance and contract compliance requirements in mind. Provisional acceptance of the work will be carried out as outlined in Sections 3 and 4 above.

NVL Detailed Visual Sampling and Analysis on Randomly Selected Two Percent (2%) of Surfaces Abated

After NVL has provisionally accepted the work, then NVL will carry out the verification sampling as follows:

1. Make a rough calculation of the total square footage of the abated surface area ready for inspection and record the dimensions and calculation in a separate set of Verification Sampling and Analysis Field Notes (the "Sampling Notes") (separate from or set off in a separate section from NVL's regular daily field notes);

2. Calculate the square footage that is two percent of the total square footage of the area ready for inspection and record that calculation in the Sampling Notes.

3. Before the verification sampling begins, draw a simple diagram of the inspection area in the Sampling Notes. Then, randomly select at least three distinct sample areas of at least one square foot of surface area, within each of the three discrete sampling areas. Draw the sample area dimensions and locations on the inspection diagram. These diagrams are to be carefully drawn, but hand drawn to approximate scale for record keeping purposes is acceptable. Perfect or exact scale drawings are not required. The total area sampled shall be at least two percent of the surface area abated, but may exceed two percent, depending upon the overall size of the particular area under review, in order to ensure that a minimum of three, one square foot samples are reviewed, for each segment of work.

4. NVL shall use its discretion to field measure and mark out the sampling area, in the most efficient manner possible, with chalk or masking tape or other media, either at the corners alone or all four sides. Then, NVL personnel shall make a detailed and close visual inspection of the sampling area.

5. NVL shall photograph the sampling area and make the photographs a part of the Sampling Notes, captioning or documenting within the photograph the sampling area that it represents.

6. The sampling area shall be designated with the building number, the ordinal direction of the elevation or wall (N=north facing, S=south facing, E=east facing, W=west facing) and the level (G=ground, 1=first level of scaffolding and so on). So, for example, if the west facing wall of building 13 is sampled on the 2nd level of scaffolding the sample area will be designated in the Sampling Notes and in the photograph(s) as 13-W-2.

6	**Waste Management Plan, Including On-site Storage and Off-site Disposal**	

Waste management will comply with all applicable regulations.

Rainier Commons will manage all waste at the site to assure proper storage and disposal. NVL will conduct inspections for Contractor compliance to this plan and the contract documents and for proper handling and transport to designated temporary storage on site.

Emerald Services, or other similarly qualified waste disposal Contractor, will work with Rainier Commons as its waste disposal vendor.

Applicable regulations emphasized by the EPA include:

- Disposal of paint/blasting media as PCB bulk product waste will be disposed of pursuant to the requirements of 40 CFR 761.62 (a) or (b), and disposal of containment structure materials, personal protective equipment, and all non-liquid cleaning materials will be disposed of pursuant to the requirements of 40 CFR 761.61(a)(5)(v).
- Storage of wastes from the paint removal project are subject to the storage requirements of 40 CFR 761.65, based on the presumption that cleanup wastes from media blasting will contain PCBs at concentrations >50 ppm.
- Wastes may be stored according to the technical standards of 40 CFR 761.65(b), or if wastes are to be stored for a period of 30 days or less, to the standards of 761.65(c)(1).
- Use of portable secondary containment is an acceptable means of demonstrating compliance with the curb requirements of 761.65(b)(1)(ii).
- Wastes generated by this work may contain liquids from water used for dust control during media blasting, shower and washing facilities, decontamination, or other uses, which would then require compliance with the standards at 40 CFR 761.65(c)(1)(iv).
- Labeling requirements will also apply to waste containers and for the areas where PCBs are stored according the requirements of 40 CFR 761.65(c)(3), 40 CFR 761.40(a)(10), 40 CFR 761.45 and as outlined in Section 3 above.

Rainier Commons will provide designated area at site for temporary storage of waste. This site may vary as the Contractor proceeds through the phases of work. Rainier Commons requests pre-construction meeting with EPA for planning and approval of temporary waste storage plan on-site, in advance of Contractor's initial mobilization.

Only non-liquid PCB waste may be disposed of pursuant to 40 CFR 761.62(a) and (b). Therefore, all efforts will be made to keep the use of water in contact with PCB affected waste to a minimum. However, some liquid waste will be generated during this work, through dust control, decontamination, worker showers, and so forth. All such liquid waste shall be collected, contained and separately disposed of. No such liquid waste shall be allowed to enter the sanitary sewer or storm water systems, other than as provided for under 40 CFR 761.79(b)(1) or the King County discharge authorization No. 4201-01.

Contractor is to comply with any and all manifest and record requirements.

Rainier Commons will make appropriate arrangements with its waste disposal vendor to ensure that wastes are timely removed and disposed of throughout the duration of this project.

Rainier Commons will continue with all on-going source control and maintenance tasks throughout the remediation process, including weekly hardscape sweeping with truck, manual collection of paint chips in areas not truck swept, filter sock inspections and

maintenance at catch basins and roof drains, in addition to Contractor daily clean-up while on site.

7 Reporting and Recordkeeping Requirements

Summary of the reporting and record keeping requirements:

- Any and all of the following records will be available to the EPA for review upon request.

Pre- Project

- Documentation of any *Data Gap Analysis* assessment if an area is deemed not to be PCB containing.
- Record of this Work Plan.
- Receipt of approval from EPA to conduct work per this Work Plan.
- Written notification by Rainier Commons to Contractor that approval from the EPA has been received to conduct this work and that it is to be done per the Work Plan.
- Health and Safety Plan (per section 9 of this Work Plan).
- Written notification to the EPA that all on-site personnel who will be conducting activities have appropriate qualifications and training for PCB abatement.

During Project

During the project, the following records will be established and maintained:

- Contract Documents
- Site control – sign in / sign out sheets
- NVL daily inspection reports
- PCB analytical test results and waste characterization
- Contractor notification to NVL that paint abatement is complete and ready for inspection
- NVL Post Paint Removal inspection reports including Sampling Notes
- Notification to EPA that a location of paint removal is complete and available for inspection
- Documentation of EPA inspection action
- NVL final clearance documentation for abatement
- Certificates of disposal for all PCB wastes regulated for disposal under 40 CFR 761, and documentation of any manifest discrepancies that are received

Post Project

After the project, a final closeout document will be created which will include:

- NVL daily inspection reports and Sampling Notes
- Any additional field notes and photographs of activities
- PCB analytical test results and waste characterization
- Waste disposal manifests

The records shall be maintained by Rainier Commons for a minimum period of seven years, following completion of the project.

Rainier Commons anticipates continuing with its weekly conference call to EPA regarding general progress and current issues during the course of the work.

8	Schedule	

General Schedule

The work will be completed in phases, and as a result, Individual Phased Work Plans (IPWP) will be developed by the Contractor and submitted to Rainier Commons and NVL for approval prior to starting each phase of work. Each IPWP will be forwarded to EPA upon approval by Rainier Commons and NVL a minimum of 20 days prior to commencement of that new phase of work. Each IPWP will address specifics to that phase of work.

The overall duration of the work for full exterior abatement is to be determined. However, Rainier Commons will require prospective Contractors to provide critical path estimates for all phases of the work with their initial bids. These duration of work estimates will be reported to EPA upon receipt.

The schedule for moving from approval of this Work Plan through commencement of the work is as follows:

1. EPA approves this Work Plan and provides notice to Rainier Commons of approval.

2. Rainier Commons submits bid package to pre-selected bidder group, or as an alternative enters into contract negotiations with pre-selected and pre-qualified Contractor, within 30 days of EPA's approval of this Work Plan.

3. Contractor(s) will have 30 days to present their detailed bid packages.

4. Rainier Commons will have up to 45 days to review bid packages, communicate with Contractors for clarification or supplementation and follow up with verification on qualifications.

5. Within 45 days of receipt of bid packages Rainier Commons will send out notice of contract award.

6. Contractor shall commence work within 30 days of notice of contract award. The ability to mobilize within this time frame will be a pre-condition of contract award.

Summary of Timing

Approval of Work Plan by EPA + 30 days to send out to bid + 30 days for Contractor bid preparation and submission + 45 days for bid evaluation and final Contractor selection/notice of contract award + 30 days to commence work.

Pre-construction meetings

In the 30 days after the contract is awarded Rainier Commons will meet on site with Contractor for pre-construction meeting(s) and meet with EPA on-site regarding temporary waste storage and any other work related issues.

9 Health and Safety Plan (Worker Health & Safety)

The purpose of the Health and Safety Plan (HASP) is to maintain a work environment, including use of personal protective equipment, which prevents dermal, inhalation or other exposure to PCB bulk product waste, PCB remediation waste, blasting media, and any other job site hazards, which may pose an unreasonable risk of injury to health and the environment.

Rainier Commons will use the Health and Safety Plan prepared by CDM, now CDM Smith, on October 5, 2009 that was previously approved for use by EPA, as a sample template for the Contractor's initial reference; however, the Contractor will be responsible for providing the operational Health and Safety Plan for this project. The scope of work for the Contractor's Health and Safety Plan will reflect the work outlined in this Work Plan. NVL will provide a good faith inspection report to the Contractor addressing known hazards involved with this Work Plan, but the Contractor will be responsible for verifying and addressing all relevant site hazards and conditions to be addressed by the Health and Safety Plan.

Focus on worker safety as well as site protection, protection of interior of buildings and protection of stormwater intakes (catch basins/manholes) are of paramount importance. Secondary containment and barriers, spill protection and emergency response for any containment breach (although there should be none) will require detailed advanced planning for this work.

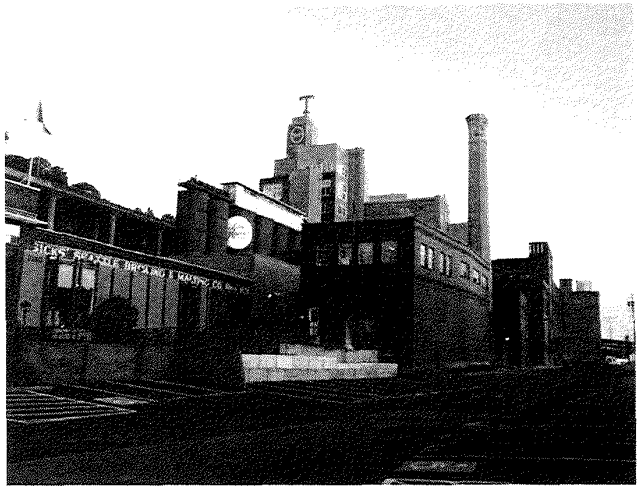
The Contractor shall provide its Health and Safety Plan as a part of its bid package or immediately following the notice of contract award. The Contractor's Health and Safety Plan shall address the hazards and requirements of the work in this Work Plan and will be provided to EPA for final approval at the Project Manager Level.

10	References	

1. Rainier Commons Exterior Walls Abatement Project September 2012 - attached as Exhibit A
2. Building footprint map showing color coded priority areas - attached as Exhibit B
3. Rainier Commons Paint Abatement Priority Schedule – attached as Exhibit C
4. Building 1 Tully's Space Follow-up Proposed Sampling Figure - attached as Exhibit D
5. CDM December 9, 2011 report on Building 6, Level 600/700 Paint Removal ("sixth floor work")
6. Laboratory analysis substrate samples brick and concrete from sixth floor work Columbia Analytical Services report December 23, 2011
7. Laboratory analysis composite sample of plaster substrate from Tully's interior abatement Columbia Analytical Services report dated May 9, 2012.
8. CDM Health and Safety Plan dated October 5, 2009

EXHIBIT A

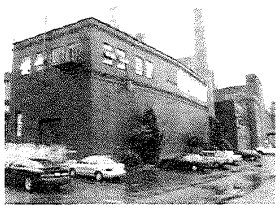
Rainier Commons Exterior Walls Abatement Project



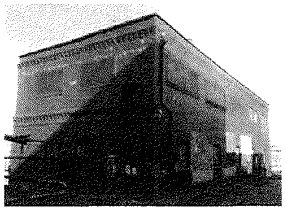
September 2012

Rainier Commons Exterior Walls Abatement Project

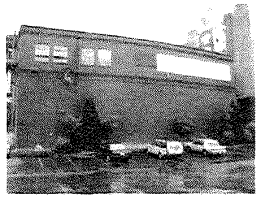
Building 13



North/West elevation



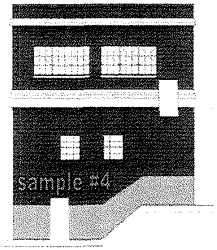
South/East elevation



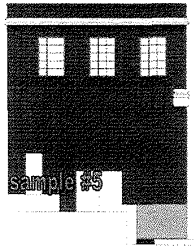
West elevation

East elevation

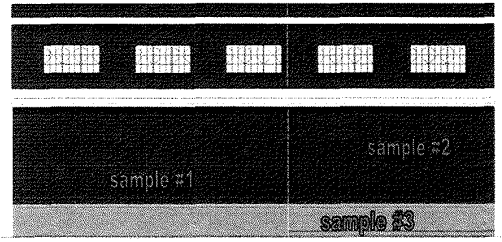
LEGEND
BRICK
CONCRETE
SAND ROCK
OTHER



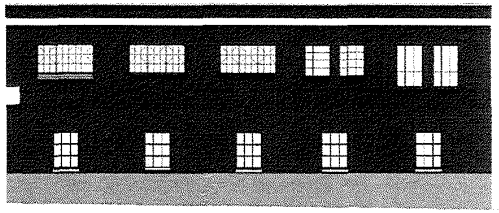
SOUTH ELEVATION
BUILDING 13



NORTH ELEVATION
BUILDING 13



WEST ELEVATION
BUILDING 13



EAST ELEVATION
BUILDING 13

Wall dimension

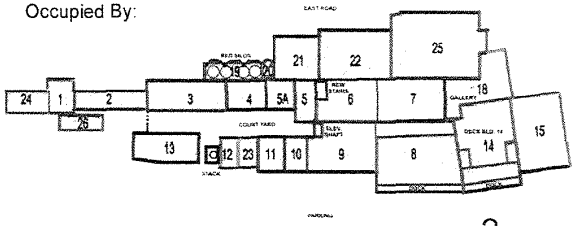
BLDG	ELEV	BRICK SF(EXCLUDING OPENING)	CONCRETE SF(EXCLUDING OPENING)	SAND ROCK	OTHER	TOTAL
13	north	910	53			
13	South	850	55			
13	East	2,065	472			
13	west	2,585	482			
TOTAL		6,350	1062			7,452

PCB lab result

SAMPLE #	PCB TYP	Arocolr mg/kg		DATE	LAB	SAMPLE ID	LOCATION	RESOURCE
*1	PCB-1254/1260	PCB 679	PCB 408	09/11/09	Dragon Lab	090903-04	West wall	RC
*2	PCB-1254/1260	PCB 213,000	PCB 108,000	09/11/09	Dragon Lab	090903-04	West wall?	RC
*3	PCB-1254/1260	PCB 950	PCB 550	09/01/09	Manchester Lab	09354100	West wall footing?	EPA
4	PCB-1254	PCB 23,500	-	05/31/12	Spectra Lab	2012060080	South wall	RC
5	PCB-1254	PCB 23,500	62,200	05/31/12	Spectra Lab	2012060080	North wall	RC

Building information

Building Materials: brick and concrete footing
Building color: red
Building Status: Vacant
Occupied By:

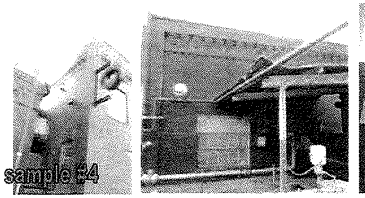


BLDG. 13
LAST TIME UPDATED 09/14/12

2

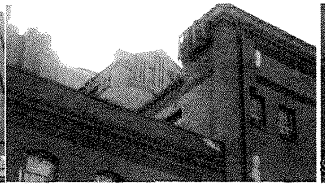
Rainier Commons Exterior Walls Abatement Project

Buildings 12, 23, 11, 10



North elevation-bldg 12

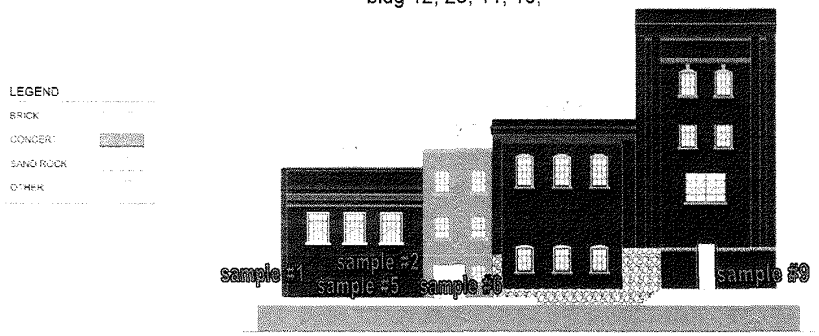
West elevation
bldg 12, 23, 11, 10,



North/West elevation bldg 10

East elevation
Bldg 11, 23, 12

East elevation
Bldg 10



West elevation bldg. 12 23 11 10

Wall dimension

BLDG	ELEV	BRICK SF(EXCLUDING OPENING)	CONCRETE SF(EXCLUDING OPENING)	SAND ROCK	OTHER	TOTAL
12, 23, 11, 10	north	910, 500, 300, 750				
12, 23, 11, 10	South	350 (bldg #10)				
12, 23, 11, 10	East	576, - , 760, 1,065	265 (bldg #23)			
12, 23, 11, 10	west	860, 325, 1,410, 2,680				
TOTAL		10,486	265			10,751

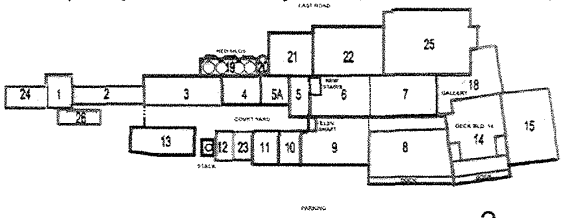
*concrete footing and sand rock are included in the SF. Can provided breakdown as needed.

PCB lab result

SAMPLE #	PCB TYP	Arocolr mg/kg		DATE	LAB	SAMPLE ID	LOCATION	RESOURCE
*1	PCB-1254/1260	PCB 189	PCB 83.3	09/11/09	Dragon Lab	090903-04	**Bldg #12** east wall(north corner)	RC
*2	PCB-1254/1260	PCB 30.1	PCB 18	09/11/09	Dragon Lab	090903-04	**Bldg #12** east wall(south corner)	RC
*3	PCB-1254/1260	PCB 7,100	PCB 2,900	02/22/10	Test America	580-17796-14	**Bldg #12** east wall	RC
*4	PCB-1254/1260	PCB 3.8	PCB 7.4	09/01/09	Manchester Lab	09354103	**Bldg #12** northwest wall	EPA
*5	PCB-1254/1260	PCB 11	PCB 8.2	09/01/09	Manchester Lab	09354103	**Bldg #12** west wall	EPA
*6	PCB-1254/1260	PCB 7,600	PCB 2,500	02/22/10	Test America	580-17796-3	**Bldg #23** west wall	RC
*7	PCB-1254/1260	PCB 2,500	PCB 1,200	02/22/10	Test America	580-17796-15	**Bldg #11** east wall	RC
*8	PCB-1254/1260	PCB 730	PCB 59	02/22/10	Test America	580-17796-16	**Bldg #10** east wall	RC
*9	PCB-1254/1260	PCB 7,300	PCB 2,900	09/01/09	Manchester Lab	09354104	**Bldg #10** west wall (north side)	EPA
*10	PCB-1254/1260	PCB 16,700	-	06/01/12	Spectra Lab	2012060081	**Bldg #10** South wall	RC

Building information

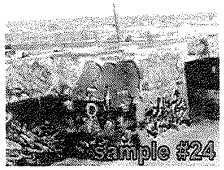
Building Materials: brick, concrete footing, sand rock
Building color: red & orange
Building Status: Occupied
Occupied By: Red Soul, Jet City Stream, BMQ & Bartholomew,



BLDG. 12, 23, 11, 10
LAST TIME UPDATED 09/04/12

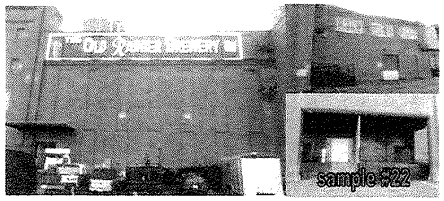
Rainier Commons Exterior Walls Abatement Project

Buildings #9, #8, #14, #15

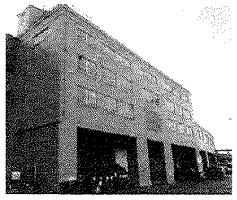


North elevation 15

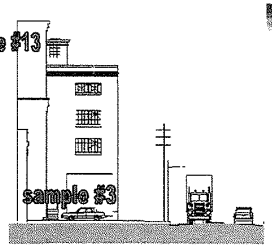
North parapet bldg 8



West elevation, bldg 9

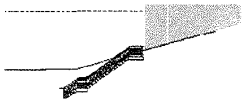

15,14

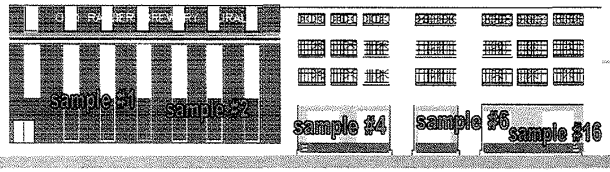
North/West elevation bldg 8



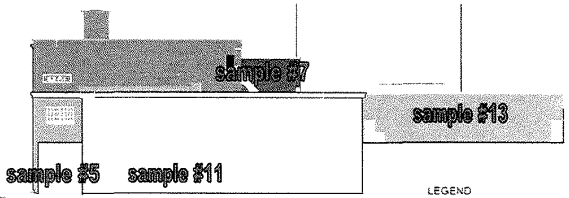
South elevation bldg 15

North elevation, bldg 8


East elevation



West elevation, bldg 9 **Bldg. 8** **Bldg. 14** **Bldg. 15**



South elevation Bldg. 8, 14, 15, 18

Wall dimension

BLDG	ELEV	BRICK SF(EXCLUDING OPENING)	CONCRETE SF(EXCLUDING OPENING)	SAND ROCK	OTHER	TOTAL
9, 8, 14, 15	North	750	912(bldg #8), 1000(bldg #14)			
9, 8, 14, 15	South	350, 1,800	255, 3,000			
9, 8, 14, 15	East	155, N/A	1,300(bldg #14)?			
9, 8, 14, 15	West	3,822	Bldg 9 Parapet wall, 3,560, 1992, 1,372			
TOTAL		**6,877**	**13,391**			**20,268**

*Bldg #8 elevator shaft. Catwalk structure and parapets SQFT walls need to be added. * Bldg #14 south and north wall SQFT walls need to be added.
* Bldg #15 north gallery wall SQFT walls need to be added.

PCB lab result

SAMPLE #	PCB TYP	Arocolr mg/kg		DATE	LAB	SAMPLE ID	LOCATION	RESOURCE
*1	PCB-1254/1260	PCB 33,000	PCB 19,000	09/11/09	Dragon Lab	090903-04	**Bldg #9** west wall	RC
*2	PCB-1254/1260	PCB 41,000	PCB 27,000	02/22/10	Test America	580-17796-17	**Bldg #9** west wall	RC
*3	PCB-1254/1260	PCB 123	PCB 70.2	09/11/09	Dragon Lab	090903-04	**Bldg #8** north wall	RC
*4	PCB-1254/1260	PCB 8,500	PCB 3,900	09/01/09	Manchester Lab	09354105	**Bldg #8** west wall (1st flr)	EPA
*5	PCB-1254/1260	PCB 11,000	PCB 4,400	02/22/10	Test America	580-17796-18	**Bldg #8** south wall	RC
*6	PCB-1254 only	PCB 2.64	-	12/14/11	Spectra	2011120308	**Bldg #8** west wall (1st flr)	RC
*7	PCB-1254 only	PCB 8.65	-	12/14/11	Spectra	2011120308	**Bldg #8** south wall (2nd flr)	RC
*8	PCB-1254 only	PCB 4.22	-	12/14/11	Spectra	2011120308	**Bldg #8** east wall (4th flr)	RC
*9	PCB-1254 only	PCB 174	-	12/14/11	Spectra	2011120308	**Bldg #8** north wall (4th flr)	RC
*10	PCB-1254/1260	PCB 3,500	PCB 1,800	02/22/10	Test America	580-17796-13	**Bldg #14** west	RC
*11	PCB-1254 only	PCB 0.81	-	02/22/10	Test America	580-17796-11	**Bldg #15** south	RC
*12	PCB-1254/1260	PCB 290	PCB 220	02/22/10	Test America	580-17796-12	**Bldg #15** west	RC

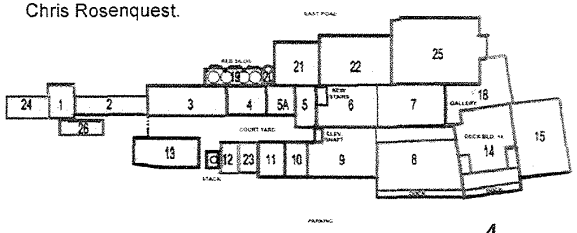
Building information

Building Materials: brick and concrete footing

Building color: Mural/orange/yellow/graphite (Gallery)

Building Status: Occupied/vacant

Occupied By: 100 level- bld #9-Novustone, bld #8 Emerald City Beer, bld #14 Tully's. 200 level - bld #15 Rogue Island level 100 Chris Rosenquest.



BLDG. 9, 8, 14 outside walls, 15

LAST TIME UPDATED 09/14/12

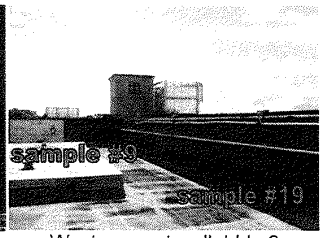
Rainier Commons Exterior Walls Abatement Project

Continue –

Buildings #9, #8, #14, #15

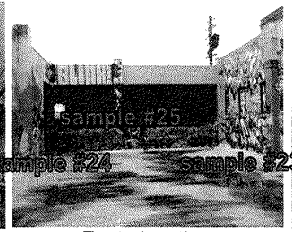
SAMPLE #	PCB TYP	Arocolr mg/kg		DATE	LAB	SAMPLE ID	LOCATION	RESOURCE
*1	PCB-1254/1260	PCB 33,000	PCB 19,000	09/11/09	Dragon Lab	090903-04	Bldg #9 west wall	RC
*2	PCB-1254/1260	PCB 41,000	PCB 27,000	02/22/10	Test America	580-17796-17	Bldg #9 west wall	RC
*3	PCB-1254/1260	PCB 123	PCB 70.2	09/11/09	Dragon Lab	090903-04	Bldg #8 north wall	RC
*4	PCB-1254/1260	PCB 8,500	PCB 3,900	09/01/09	Manchester Lab	09354105	Bldg #8 west wall (1st flr)	EPA
*5	PCB-1254/1260	PCB 11,000	PCB 4,400	02/22/10	Test America	580-17796-18	Bldg #8 south wall	RC
*6	PCB-1254 only	PCB 2.64	-	12/14/11	Spectra	2011120308	Bldg #8 west wall (1st flr)	RC
*7	PCB-1254 only	PCB 8.65	-	12/14/11	Spectra	2011120308	Bldg #8 south wall (2nd flr inside Gallery)	RC
*8	PCB-1254 only	PCB 4.22	-	12/14/11	Spectra	2011120308	Bldg #8 east wall (4th flr from roof)	RC
*9	PCB-1254 only	PCB 174	-	12/14/11	Spectra	2011120308	Bldg #8 north parapet wall (from roof)	RC
*10	PCB-1254/1260	PCB 3,500	PCB 1,800	02/22/10	Test America	580-17796-13	Bldg #14 west	RC
*11	PCB-1254	PCB 0.81	-	02/22/10	Test America	580-17796-11	Bldg #15 south	RC
*12	PCB-1254/1260	PCB 290	PCB 220	02/22/10	Test America	580-17796-12	Bldg #15 west	RC
*13	PCB-1254	PCB 4,970	-	05/31/12	Spectra Lab	2012060078	Bldg # 9 north concrete wall(courtyard)	RC
*14	PCB-1254	PCB 113,000	-	05/31/12	Spectra Lab	2012060078	Bldg # 9 north brick wall (courtyard)	RC
*15	PCB-1254	PCB 21,200	-	05/31/12	Spectra Lab	2012060078	Bldg # 9 north brick wall (courtyard)	RC
*16	PCB-1254	PCB 340	-	05/31/12	Spectra Lab	2012060079	Bldg # 8 west dock wall	RC
*17	PCB-1254	PCB 94,300	-	06/01/12	Spectra Lab	2012060078	Bldg # 9 south elevator shaft	RC
*18	PCB-1254	PCB 41,100	-	06/01/12	Spectra Lab	2012060078	Bldg # 9 south catwalk wall (from roof)	RC
*19	PCB-1254	PCB 126,000	-	06/01/12	Spectra Lab	2012060078	Bldg # 9 west parapet wall (from roof)	RC
*20	PCB-1254	PCB 16,700	-	06/01/12	Spectra Lab	2012060078	Bldg # 10 south wall(from roof)	RC
*21	PCB-1254	PCB 156,000	-	06/04/12	Spectra Lab	2012060078	Bldg # 9 east elevator shaft	RC
*22	PCB-1254	PCB 6.9	-	05/31/12	Spectra Lab	2012060084	Bldg # 14 west dock wall	RC
*23	PCB-1254	PCB 23,300	-	06/01/12	Spectra Lab	2012060084	Bldg #14 South Inside (gallery)	RC
*24	PCB-1254	PCB 11.7	-	06/01/12	Spectra Lab	2012060083	Bldg #14 North Inside (gallery)	RC
*25	PCB-1254	PCB 26.7	-	06/01/12	Spectra Lab	2012060084	Bldg #14 East Inside (gallery)	RC

South elevator shaft-bldg 9 catwalk and South bldg 10

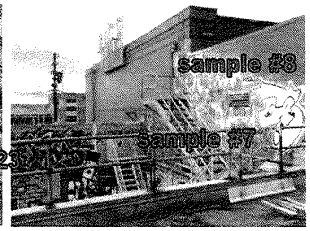


West parapet wall, bldg 9

North elevation



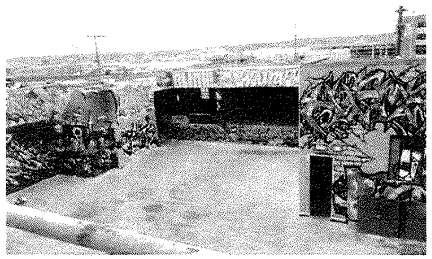
East elevation



South/East elevation wall, bldg 8

Rainier Commons Exterior Walls Abatement Project

Buildings #18 (Gallery)

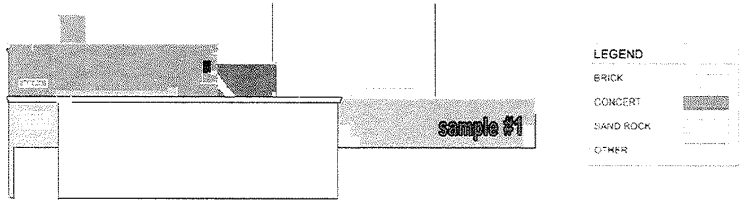


Inside North & East elevation, bldg 8/14/15/18

Inside East elevation, bldg 18

Outside South elevation, bldg 18

Outside East elevation, bldg 18



South elevation, bldg 9, 8, 15, 18

Wall dimension

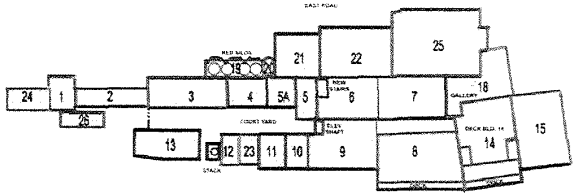
BLDG	ELEV	BRICK SF(EXCLUDING OPENING)	CONCRETE SF(EXCLUDING OPENING)	SAND ROCK	OTHER	TOTAL
18	North					
18	South					
18	East					
18	West					
TOTAL						

PCB lab result

SAMPLE #	PCB TYP	Arocolr mg/kg		DATE	LAB	SAMPLE ID	LOCATION	RESOURCE
*1	PCB-1254/1260	PCB 4.7	PCB 3.4	02/22/10	Test America	580-17796-10	**Bldg #18** south Outside(gallery)	RC
*2	PCB-1254	PCB 52,700	-	06/04/12	Spectra Lab	2012060082	**Bldg #18** East Outside (gallery)	RC
*3	PCB-1254	PCB 94	-	06/01/12	Spectra Lab	2012060082	**Bldg #18** West Inside (gallery)	RC

Building information

Building Materials: Concrete
Building color: Red/Yellow/Graphite
Building Status: 200 level vacant
Occupied By: 100 level-bld. #14 Tully's



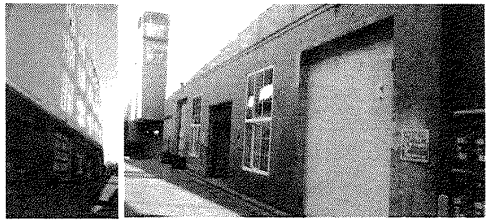
BLDG.18 (Gallery), BLDG. 14- 200 level, inside galler
yLAST TIME UPDATED 09/14/12

Rainier Commons Exterior Walls Abatement Project

Buildings #25

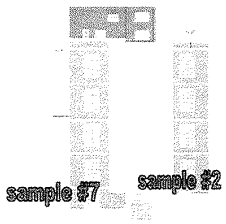

North elevation


South elevation


East elevation

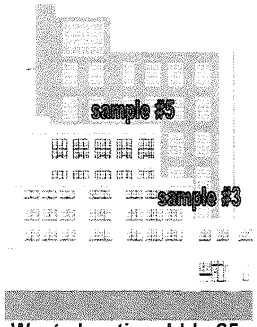

West elevation

North elevation, bldg 25

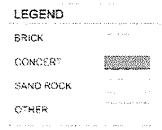


South elevation, bldg 25

East elevation, bldg 25



West elevation, bldg 25



Wall dimension

BLDG	ELEV	BRICK SF(EXCLUDING OPENING)	CONCRETE SF(EXCLUDING OPENING)	SAND ROCK	OTHER	TOTAL
25	North		2,980			
25	South		5,250			
25	East		4,500			
25	West		3,600			
TOTAL			16,330			16,330

*not including stairs wall with mural.

PCB lab result

SAMPLE #	PCB TYP	Arocolr mg/kg		DATE	LAB	SAMPLE ID	LOCATION	RESOURCE
*1	PCB-1254/1260	PCB 41	PCB 82.6	09/11/09	Dragon Lab	090903-04	**Bldg #25** east wall	RC
*2	PCB-1254/1260	PCB 3.7	PCB 1.4	02/22/10	Test America	580-17796-1	**Bldg #25** south wall	RC
*3	PCB-1254/1260	PCB 9.5	PCB 2.4	02/22/10	Test America	580-17796-2	**Bldg #25** west wall	RC
*4	PCB-1254 only	PCB 1.6	-	11/03/11	Spectra	2011110113	**Bldg #25** north wall	RC
*5	PCB-1254 only	PCB 1.0	-	11/03/11	Spectra	2011110113	**Bldg #25** west wall	RC
*6	PCB-1254 only	PCB 1.0	-	11/03/11	Spectra	2011110113	**Bldg #25** east wall	RC
*7	PCB-1254 only	PCB 1.0	-	11/03/11	Spectra	2011110113	**Bldg #25** south wall (between 3rd & 4th flr)	RC
*8	PCB-1254/1260	PCB 7.3	PCB 2.3	09/01/09	Manchester Lab	09354110	**Bldg #25** east wall	EPA

Building information

Building Materials: brick and concrete footing

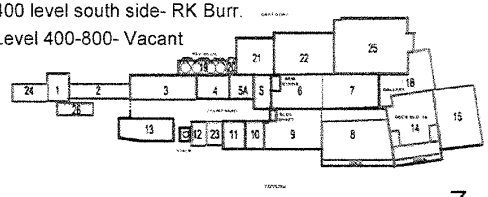
Building color: Yellow/green/red

Building Status: Occupied/vacant

Occupied By: 200/300 level - Groove universe.

400 level south side- RK Burr.

Level 400-800- Vacant

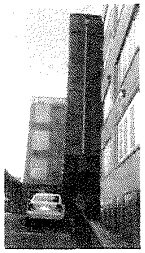


BLDG. 25

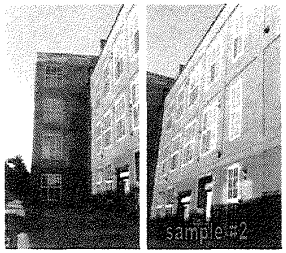
LAST TIME UPDATED 09/14/12

Rainier Commons Exterior Walls Abatement Project

Building #22

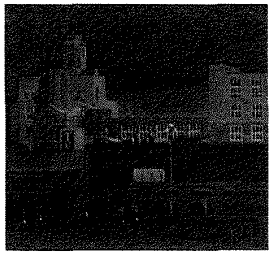


North elevation



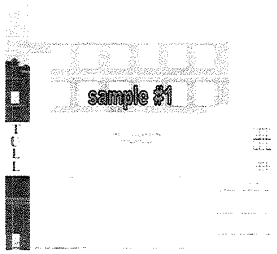
East elevation

East elevation

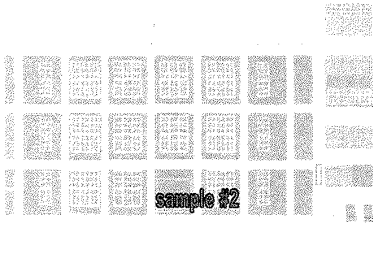


West elevation

LEGEND
BRICK
CONCRETE
SAND ROCK
OTHER



West elevation, bldg 22



East elevation, bldg 22

Wall dimension

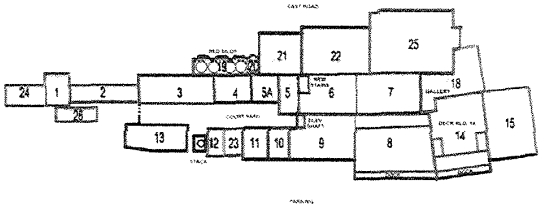
BLDG	ELEV	BRICK SF(EXCLUDING OPENING)	CONCRETE SF(EXCLUDING OPENING)	SAND ROCK	OTHER	TOTAL
22	North		332			
22	South		N/A			
22	East		2666			
22	West		815			
TOTAL			3,813			3,813

PCB lab result

SAMPLE #	PCB TYP	Arocolr mg/kg		DATE	LAB	SAMPLE ID	LOCATION	RESOURCE
*1	PCB-1254/1260	PCB 6,600	PCB 5,000	02/22/10	Test America	580-17796-4	**Bldg #22** west wall	RC
*2	PCB-1254/1260	PCB 7,700	PCB 4,500	02/22/10	Test America	580-17796-5	**Bldg #22** east wall	RC

Building information

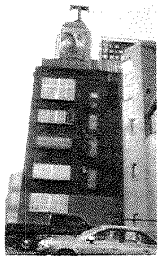
Building Materials: Concrete
Building color: Yellow/green
Building Status: Occupied
Occupied By: Sietch 22 Coop/live work spaces



BLDG. 22
LAST TIME UPDATED 09/14/12

Rainier Commons Exterior Walls Abatement Project

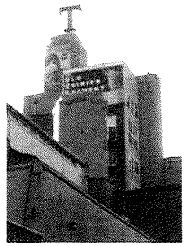
Building #21



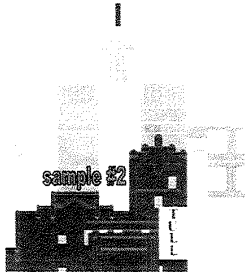
North elevation

West elevation

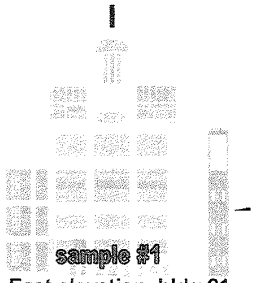
East elevation



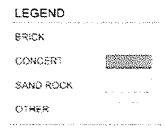
North/West elevation



North elevation, bldg 21



East elevation, bldg 21



Wall dimension

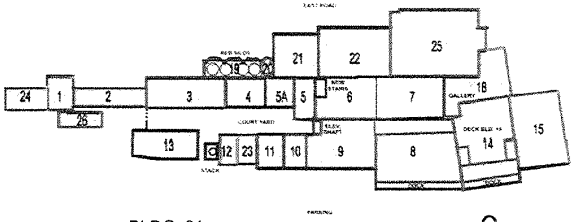
BLDG	ELEV	BRICK SF(EXCLUDING OPENING)	CONCRETE SF(EXCLUDING OPENING)	SAND ROCK	OTHER	TOTAL
21	North		3,200			
21	South		1,875			
21	East		2,900			
21	West		2,252			
TOTAL			10,227			10,227

PCB lab result

SAMPLE #	PCB TYP	Arocolr mg/kg		DATE	LAB	SAMPLE ID	LOCATION	RESOURCE
*1	PCB-1254/1260	PCB 3,700	PCB 2,100	10/22/10	Test America	580-17796-6	**Bldg #21** east wall	RC
*2	PCB-1254/1260	PCB 21,000	PCB 14,000	10/22/10	Test America	580-17796-7	**Bldg #21** west wall	RC

Building information

Building Materials: Concrete
Building color: Yellow/green/red
Building Status: Occupied
Occupied By: Sabaki Coop/live work spaces

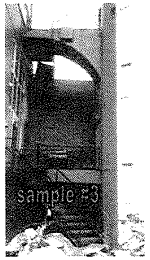


BLDG. 21
LAST TIME UPDATED 09/14/12

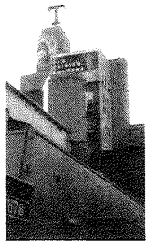
Rainier Commons Exterior Walls Abatement Project

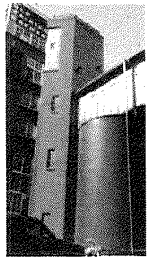
Buildings #20, #19 & Red Silo Tank Storage

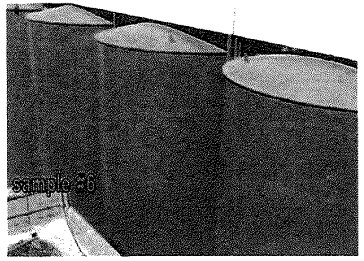
North elevation



East elevation

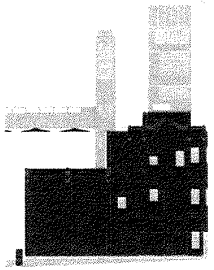

North/West elevation

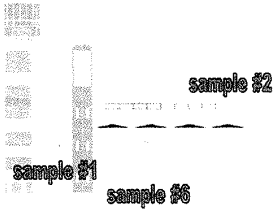

North/East elevation



East elevation

Silo height – 36'
4 – 15' Diameter Tanks
5500 Cubic Feet


West elevation, bldg 20, 19 & Red Silo



East elevation, bldg 20, 19 & Red Silo

Wall dimension

BLDG	ELEV	BRICK SF(EXCLUDING OPENING)	CONCRETE SF(EXCLUDING OPENING)	METAL	OTHER	TOTAL
20, 19	North		678, 150 silo footing	175		
20, 19	South		678	N/A		
20, 19	East		580	500		
20, 19	West		528	500		
TOTAL			2,614	1,175		3,789

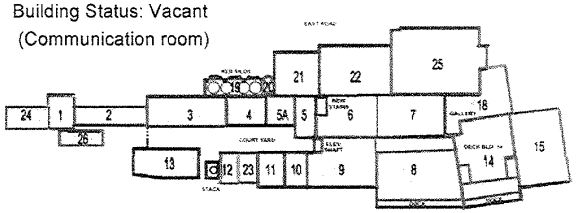
*Bridge between building 21 and 20 need to be added. *Red Silos SQF needs to be added

PCB lab result

SAMPLE #	PCB TYP	Arocolr mg/kg		DATE	LAB	SAMPLE ID	LOCATION	RESOURCE
*1	PCB-1254/1260	PCB 8,400	PCB 4,500	10/22/10	Test America	580-17796-8	**Bldg #20** east wall	RC
*2	PCB-1254/1260	PCB 3,900	PCB 2,000	10/22/10	Test America	580-17796-9	**Bldg #19** east wall	RC
*3	PCB-1254	PCB 41,200	-	06/01/12	Spectra Lab	2012060086	**Bldg #20** South/East wall	RC
*4	PCB-1254	PCB 30	-	06/06/12	Spectra Lab	2012060187	**Bldg #19** North wall	RC
*5	PCB-1254	PCB 5.9	-	05/31/12	Spectra Lab	2012060087	**Red Silos** North side wall	RC
*5	PCB-1254	PCB 16,200	-	05/31/12	Spectra Lab	2012060087	**Red Silos** Silo #2	RC

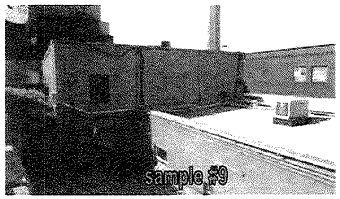
Building information

Building Materials: Concrete
Building color: Green/red/yellow
Building Status: Vacant
(Communication room)

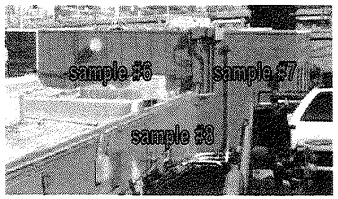


Rainier Commons Exterior Walls Abatement Project

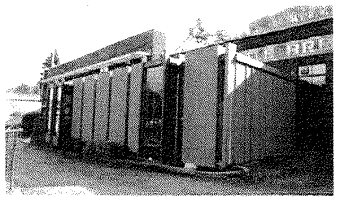
Buildings #24, #26, #1, #2 & #3



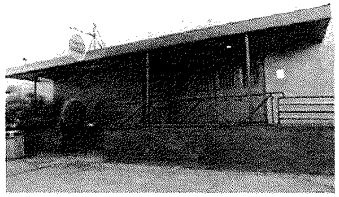
North elev. Bldg. 3, East elev. bldg 2



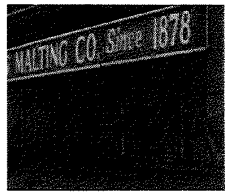
South elevation bldg 1,
East elevation bldg 2



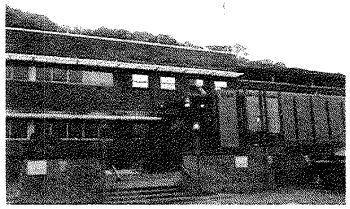
South/West elevation bldg 26



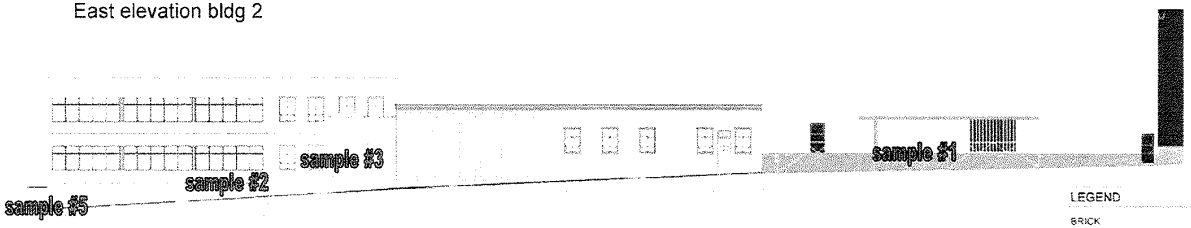
West elevation bldg 3



West elevation bldg 2



West elevation bldg 24, 26



West elevation, bldg 24 bldg bldg 1 bldg 26 bldg 2 bldg 3

LEGEND
BRICK
CONCRETE
SAND ROCK
OTHER

Wall dimension

BLDG	ELEV	BRICK SF(EXCLUDING OPENING)	CONCRETE SF(EXCLUDING OPENING)	SAND ROCK	OTHER	TOTAL
24, 3	North		525 bldg #24 footing, 800			
1	South		400 (partially metal)			
2, 3	East	830, 462(check if brick or blocks)	N/A			
24,3	West		1250, 1,800(Concrete, new brick & stairs wall)			
TOTAL		1,292	4,775			6,067

* Building #24 N/A, footing west/north/east TBD *Building #26-new wood structure N/A *Building west elevation exposed brick N/A

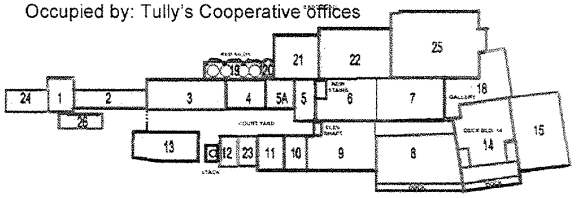
PCB lab result

SAMPLE #	PCB TYP	Arocolr mg/kg		DATE	LAB	SAMPLE ID	LOCATION	RESOURCE
*1	PCB-1254/1260	PCB 4.9	PCB 2.7	02/22/10	Test America	17796-8	**Bldg #3** West wall	RC
*2	PCB-1254/1260	N/D	N/D	09/11/09	Dragon Lab	09090304	**Bldg #1** West wall	RC
*3	PCB-1254/1260	PCB 86	PCB 86	09/01/09	Manchester Lab	09354109	***Bldg #24** West wall(north of entr	EPA
*4	PCB 1254	PCB 9.4	-	06/04/12	Spectra Lab	2012060085	**Bldg #24** East of stairs wall	RC
*5	PCB 1254	PCB 4	-	05/31/12	Spectra Lab	2012060085	**Bldg #24** North wall	RC
*6	PCB 1254	PCB 5	-	05/31/12	Spectra Lab	2012060067	**Bldg #1** South Metal wall	RC
*7	PCB 1254	PCB 5	-	05/31/12	Spectra Lab	2012060067	**Bldg #1** South Brick wall	RC
*8	PCB 1254	PCB 4	-	05/31/12	Spectra Lab	2012060073	**Bldg #2** East wall	RC
*9	PCB 1254	PCB 3.5	-	06/01/12	Spectra Lab	2012060074	**Bldg #3** East wall	RC
*10	PCB 1254	PCB 3.4	-	06/01/12	Spectra Lab	2012060074	**Bldg #3** North wall	RC

*Bldg #1 is actually bldg #24 in EPA lab results.
-Bldg # 24 new brick structure.
-Bldg # 26 new wood structure.
-Bldg #2 west elevation brick structure-has no paint.

Building information

Building Materials: New brick, concrete, wo
Metal (south wall bldg #1)
Building color: Green/Brown/Red
Building Status: Occupied
Occupied by: Tully's Cooperative offices

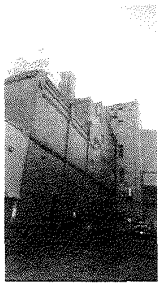


BLDG. 24, 26, 1, 2 & 3
LAST TIME UPDATED 09/14/12

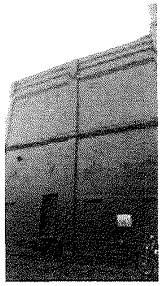
Rainier Commons Exterior Walls Abatement Project

Buildings #4, #5A & #5

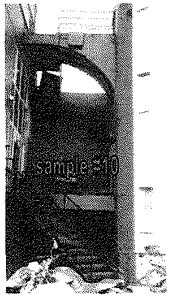
North/West elevation
Bldg 5, 5A



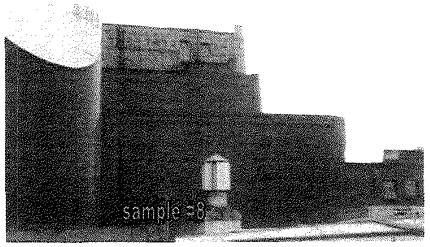
West elevation
bldg 4, 5A, 5



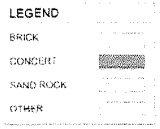
West elevation
bldg 4, 5A, 5

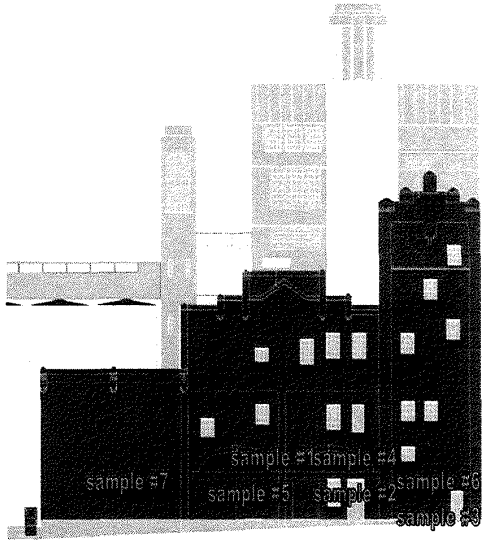


East elevation
Bldg 5A



North elevation bldg 4





West elevation, bldg 4 bldg 5A bldg 5

Wall dimension

BLDG	ELEV	BRICK SF(EXCLUDING OPENING)	CONCRETE SF(EXCLUDING OPENING)	SAND ROCK	OTHER	TOTAL
4, 5A ,5	North	800, 800, 1,795				
4, 5A ,5	South	N/A , N/A , N/A				
4, 5A ,5	East	525, 450, N/A				
4, 5A ,5	West	1,420, 2,850, 1,543				
TOTAL		**10,183**				**10,183**

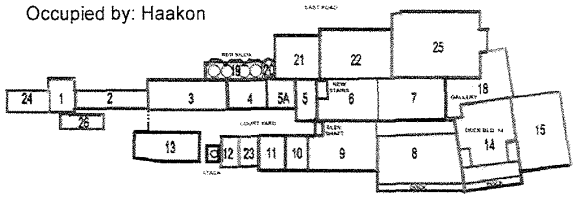
*building 5A check elevator room on roof *SF includes brick, concrete footing and sand rock footing

PCB lab result

SAMPLE #	PCB TYP	Arocolr mg/kg		DATE	LAB	SAMPLE ID	LOCATION	RESOURCE
*1	PCB-1254/1260	PCB 470	PCB 220	09/01/09	Manchester Lab	09354106	**Bldg #5A** west wall(next to stairs)	EPA
*2	PCB-1254/1260	PCB 3.7	PCB 2.8	09/01/09	Manchester Lab	09354107	**Bldg #5** west wall(sand rock)	EPA
*3	PCB-1254/1260	PCB 12,000	PCB 6,000	09/01/09	Manchester Lab	09354107	**Bldg #5** west wall(glass dr)	EPA
*4	PCB-1254/1260	PCB 146,000	PCB 85,000	09/11/09	Dragon Lab	09090304	**Bldg #5** west wall	RC
*5	PCB-1254/1260	PCB 1,740	PCB 1,070	09/11/09	Dragon Lab	09090304	**Bldg #5A** west wall	RC
*6	PCB-1254/1260	PCB 14.6	PCB 64.8	09/11/09	Dragon Lab	09090304	**Bldg #5A** west wall	RC
*7	PCB-1254/1260	PCB 3,200	PCB 1,400	02/22/10	Test America	580-17796-21	**Bldg #4** west wall	RC
*8	PCB-1254	PCB 26.2	-	05/31/12	Spectra Lab	2012060075	**Bldg #4** east wall	RC
*9	PCB-1254	PCB 52,200	-	05/31/12	Spectra Lab	2012060075	**Bldg #4** north wall	RC
*10	PCB-1254	PCB 41,000	-	06/01/12	Spectra Lab	2012060077	**Bldg #5A** east wall	RC

Building information

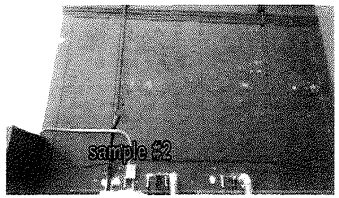
Building Materials: Brick, concrete & sand rock
Building color: Red
Building Status: Occupied partially
Occupied by: Haakon



BLDG. 4, 5 & 5A
LAST TIME UPDATED 09/14/12

Rainier Commons Exterior Walls Abatement Project

Buildings #6, #7



South elevation bldg 6

South/West elevation bldg 6

West elevation bldg 6, 7

Wall dimension

BLDG	ELEV	BRICK SF(EXCLUDING OPENING)	CONCRETE SF(EXCLUDING OPENING)	SAND ROCK	OTHER	TOTAL
6, 7	North	N/A				
6, 7	South	N/A, 1,800				
6, 7	East	N/A				
6, 7	West	2,250, 3,300				
TOTAL		7,350				7,350

PCB lab result

SAMPLE #	PCB TYP	Arocolr mg/kg		DATE	LAB	SAMPLE ID	LOCATION	RESOURCE
*1	PCB-1254/1260	PCB 2,100	PCB 1,000	02/22/10	Test America	580-17796-20	**Bldg #6** west wall	RC
*2	PCB-1254/1260	PCB 9,500	PCB 8,300	02/22/10	Test America	580-17796-19	**Bldg #7** south wall	RC
*3	PCB-1254	PCB 21,300	-	06/01/12	Spectra Lab	2012060076	**Bldg #7** west wall	RC

Building information

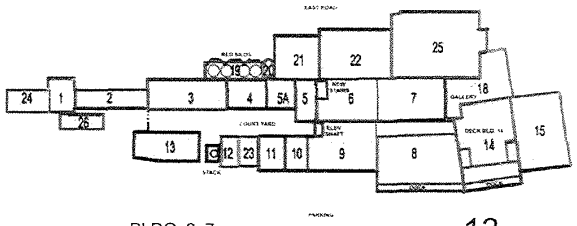
Building Materials: Concrete

Building color: Red

Building Status: Vacant floors 400-500

Occupied by: Groove Universe level 200-300

(Basement level)



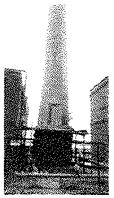
BLDG. 6, 7

LAST TIME UPDATED 09/14/12

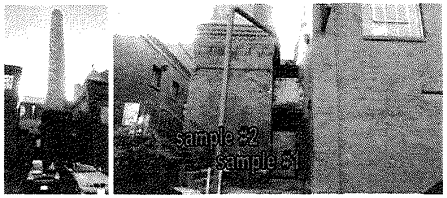
Rainier Commons Exterior Walls Abatement Project

Building Chimney Structure & Stairs

North elevation



East elevation



West elevation

West elevation

Wall dimension

BLDG	ELEV	BRICK SF(EXCLUDING OPENING)	CONCRETE SF(EXCLUDING OPENING)	SAND ROCK	OTHER	TOTAL
Chimney	North					
	South					
	East					
	West					
TOTAL		2,760				2,760

* verify SF for structure below chimney(red concrete)

PCB lab result

SAMPLE #	PCB TYP	Arocolr mg/kg		DATE	LAB	SAMPLE ID	LOCATION	RESOURCE
*1	PCB-1254/1260	PCB 250	PCB 140	09/01/09	Manchester Lab	09354109	**Chimney** west lower wall	EPA
*2	PCB-1254/1260	PCB 98.3	PCB 55.6	09/11/09	Dragon Lab	09090304	**Chimney** west wall	RC
*3	PCB-1254	PCB 11,000	-	06/01/12	Spectra Lab	2012060088	**Chimney** south wall	RC

Building information

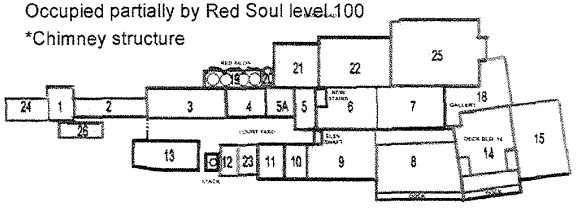
Building Materials: Brick/Concrete

Building color: Red/Green

Building Status: Vacant

Occupied partially by Red Soul level 100

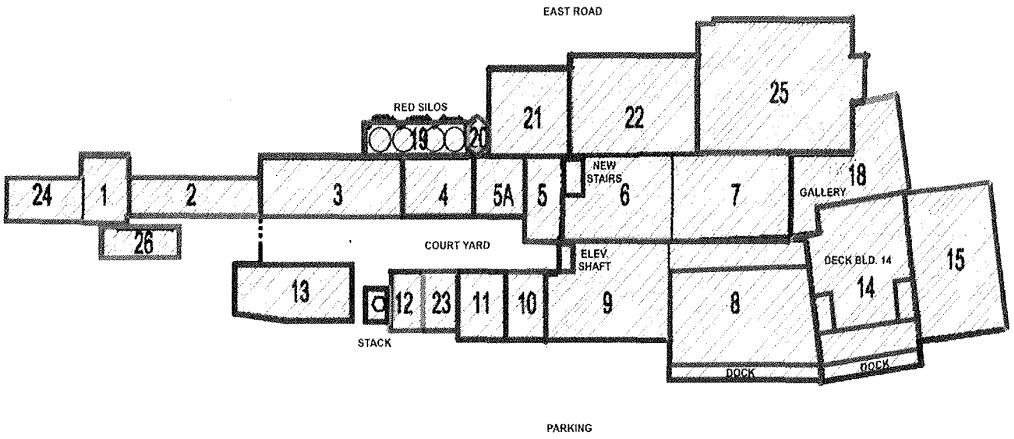
*Chimney structure



BLDG. Chimney structure

LAST TIME UPDATED 09/14/12

EXHIBIT B



KEY PLAN

N.T.S.

EXHIBIT C

RAINIER COMMONS LLC

Paint abatement priority schedule as of

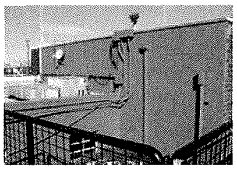
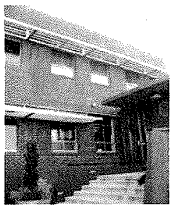
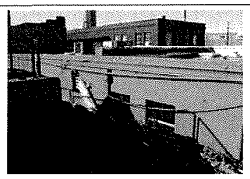
MARCH 2013

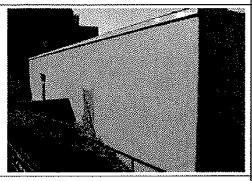
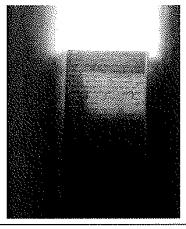
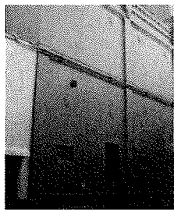
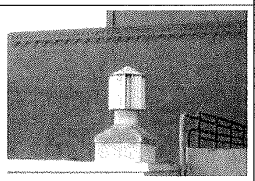
High priority for abatement	1
Moderate priority for abatement	2
Low to moderate priority for abatement	3
Low priority for abatement	4
Lowest priority	5
N/A	6

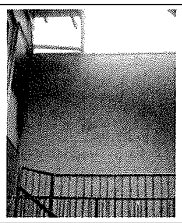
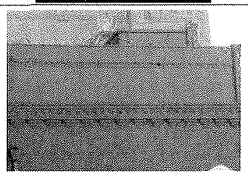
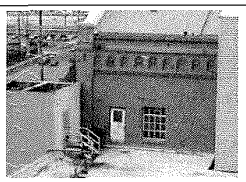
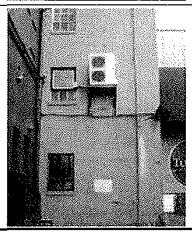
NOTE:

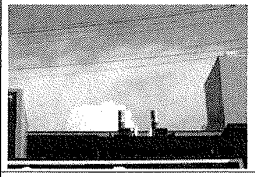
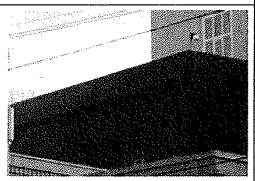
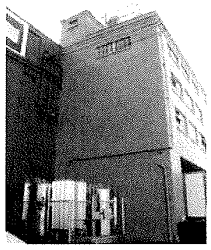
1) The above is intended to be a general representation of the noted surface areas, based on visual observations at the present time.

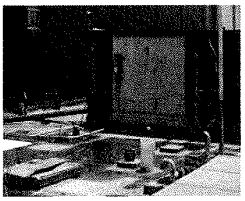
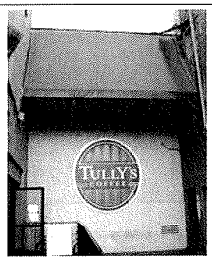
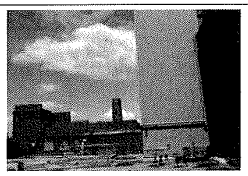
2) Priority is currently based upon PCB concentration and condition of the paint.

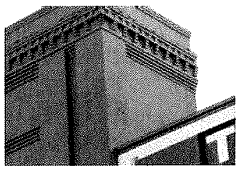
BUILDING	ELEVATION	PHOTO	RATING		SF	STORIES
1	N		6		120	2
1	S		5		400	1+
1	E		6		240	1
1	W		6		N/A	N/A
2	N	N/A	N/A	N/A	N/A	N/A
2	S	N/A	N/A	N/A	N/A	N/A
2	E		5		830	1
2	W		N/A	N/A	N/A	N/A

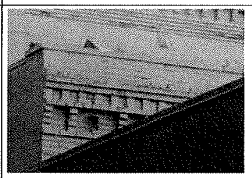
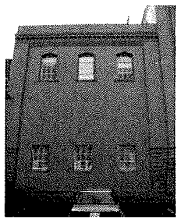
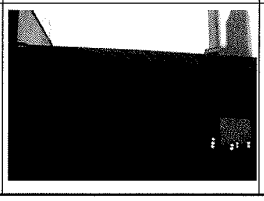
BUILDING	ELEVATION	PHOTO	RATING		SF	STORIES
3	S	N/A	N/A	N/A	N/A	N/A
3	E		5		462	1
3	W		5		1,800	2+
3	N		5		800	2
4	S	N/A	N/A	N/A	N/A	N/A
4	E		5		525	1+
4	W		1		1,420	4+
4	N		2		800	1+
5A	S	N/A	N/A	N/A	N/A	N/A

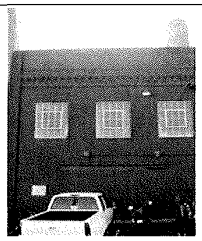
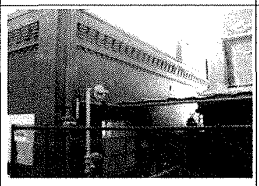
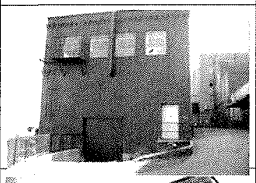
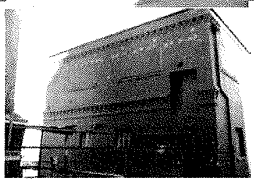
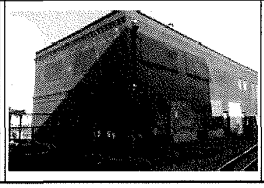
BUILDING	ELEVATION	PHOTO	RATING		SF	STORIES
5A	E		3		450	3
5A	W		1		2,850	4+
5A	N		3		1795	6
5	S		2		450	2+
5	E	N/A	N/A	N/A	N/A	N/A
5	W		2		1,545	6
5	N		2		800	3

BUILDING	ELEVATION	PHOTO	RATING		SF	STORIES
6	S	N/A	N/A	N/A	N/A	N/A
6	E	N/A	N/A	N/A	N/A	N/A
6	W		2		2,250	2
6	N	N/A	N/A	N/A	N/A	N/A
7	S		1		1,800	2+
7	W		2		3,300	2+
8	N		3		912	4+
8	S/GALLERY		5		1,800	1+

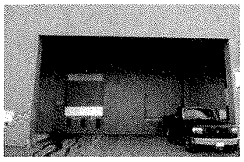
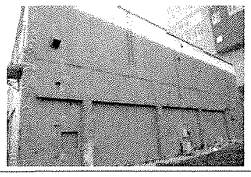
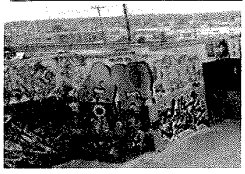
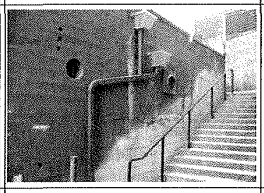
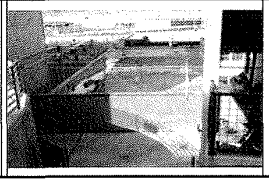
BUILDING	ELEVATION	PHOTO	RATING	SF	STORIES
8	E		5	704	1
8	W		3	3,560	4+
8	W/DOCK		5	1,300	1
9	N		1	634	
9	S		2	650	1+

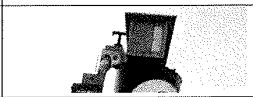
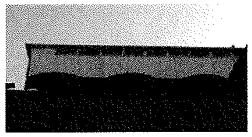
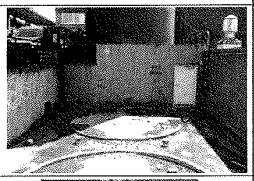
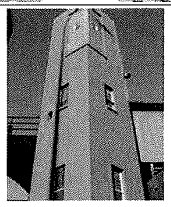
BUILDING	ELEVATION	PHOTO	RATING	SF	STORIES
9	E		1	155	3+
9	W		1	5,950	4+
10	S		2	350	1
10	E		2	1,065	3+
10	W		1	2,680	5

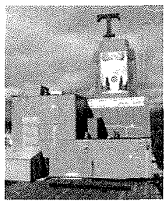
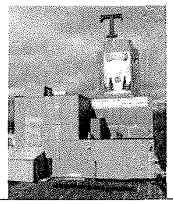
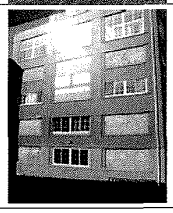
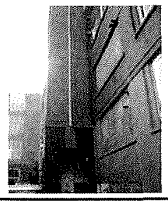
BUILDING	ELEVATION	PHOTO	RATING		SF	STORIES
10	N		1		750	1-
11	E		1		760	2+
11	W		1		1,620	3+
11	N		2		360	1+
12	S	N/A	N/A	N/A	N/A	N/A
12	E		3		576	1+

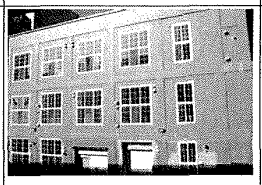
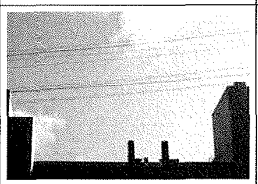
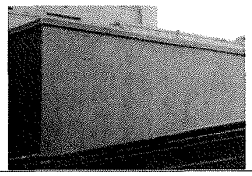
BUILDING	ELEVATION	PHOTO	RATING	SF	STORIES
12	W		5	860	2+
12	N		5	910	2
13	N		1	963	3
13	S		1	1,005	2+
13	E		1	2,815	2+

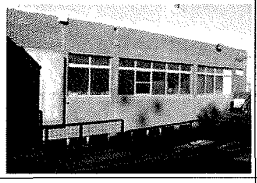
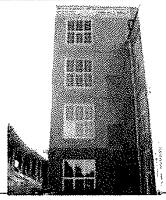
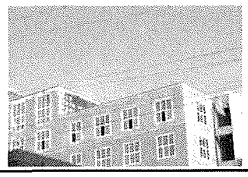
BUILDING	ELEVATION	PHOTO	RATING	[redacted]	SF	STORIES
13	W		1		3,067	3
14	S		1		295	2+
14	S/DECK		5		470	1
14	N		5		324	1
14	E/DECK		5		700	1
14	W		1		1,992	2+

BUILDING	ELEVATION	PHOTO	RATING		SF	STORIES
14	W/DOCK		5		1,000	1
15	S		5		3,000	2+
15	E	N/A	N/A	N/A	N/A	N/A
15	W		1		1,372	2+
15	N/GALLERY		5		600	1
18	S		5		650	1+
18	E		4		160	1

19	ELEVATION	PHOTO	RATING	SF	STORIES
18	W		5	1,110	1
19	S		5	175	1
19	E		5	500	1
19	W		5	500	4
Red Silo			3	4,000	4+
Red Silo	N/FOOTING		5	150	1
20	N/S/E/W		2	3,600	5

19	ELEVATION	PHOTO	RATING	SF	STORIES
21	N		3	3,200	7+
21	S		3	1,875	3+
21	S		3	1,875	3+
21	E		3	2,900	6+
21	W		3	2,252	6
22	N		3	332	3

BUILDING	ELEVATION	PHOTO	RATING		SF	STORIES
22	S	N/A	N/A	N/A	N/A	N/A
	E		3		2,666	3
22	W		3		813	1
23	N		4		500	1
23	E		5		265	2
23	W		2		500	3
24	N/FOOTING		5		104	1

BUILDING	ELEVATION	PHOTO	RATING		SF	STORIES
24	S	N/A	N/A	N/A	N/A	N/A
24	E/FOOTING		5		200	1
24	W/FOOTING		5		250	1
24	N		5		2,980	5+
25	S		5		5,250	5
25	E		5		4,500	4
25	W		5		3,600	5+

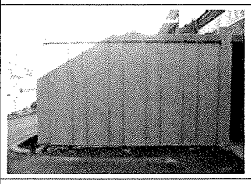
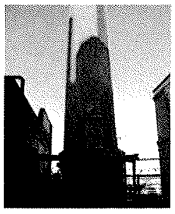
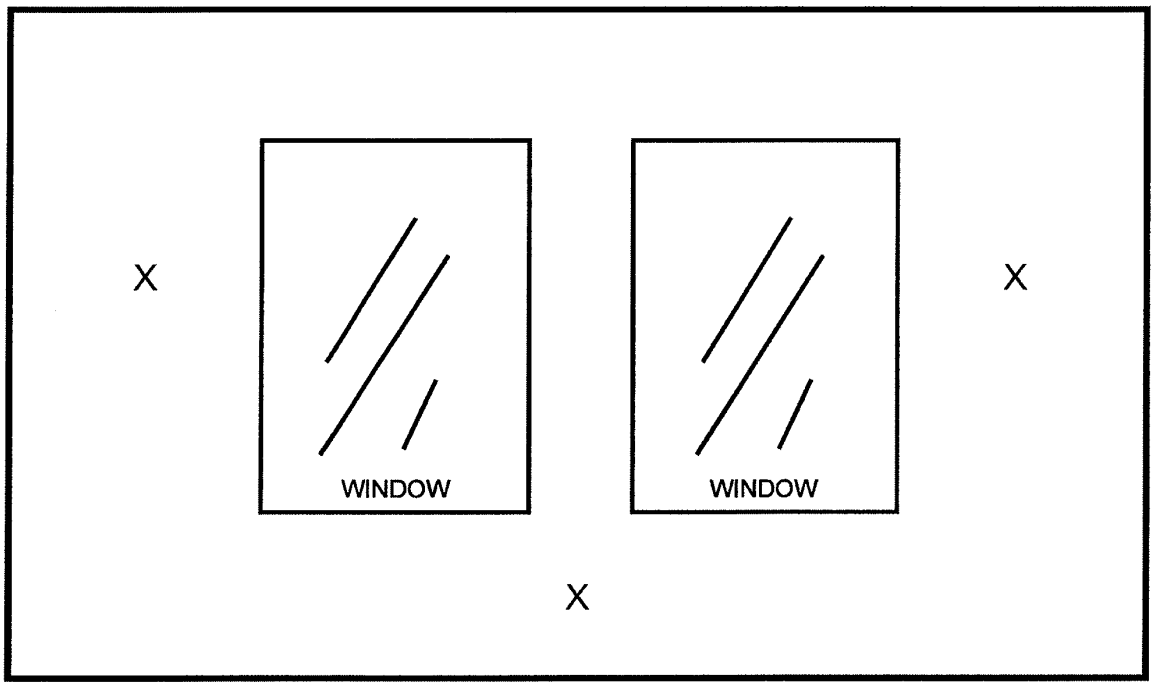
BUILDING	ELEVATION	PHOTO	RATING	SF	STORIES
26	N		6	N/A	N/A
26	S		6	N/A	N/A
26	S		6	N/A	N/A
STACK	N/S/E/W		1	2,760	5

EXHIBIT D



BUILDING #1
NORTH SECTION OF EAST WALL IN TULLY'S SPACE
ESTIMATED WALL DIM: 9' HIGH BY 15' LONG

X = WALL SAMPLES LOCATION